Attachment C1

Proponent Planning Proposal Justification Report

Goodman Property Services (Aust) Pty Limited

Burrows Industrial Estate
1-3 Burrows Road, St Peters
Planning Proposal Justification Report

March 2020

Limitations

This report: has been prepared by GHD for Goodman Property Services (Aust) Pty Limited *and may only be used and relied on by* Goodman Property Services (Aust) Pty Limited *for the purpose agreed between GHD and the* Goodman Property Services (Aust) Pty Limited *as set out in section* Goodman Property Services (Aust) Pty Limited *of this report.*

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Executive summary

Goodman Property Services (Australia) Pty Ltd (Goodman) is seeking approval to amend Clause 4.3(2) of the *Sydney Local Environmental Plan 2012* (Sydney LEP) to facilitate the redevelopment of a multi-level industrial and warehouse facility up to 29.5 metres (referred to as 'the planning proposal) at Burrows Industrial Estate, 1-3 Burrows Road, St Peters (the site). Whilst a multi-level industrial facility is currently permissible on the site, the amendment to the existing 18 metres maximum height limit planning control is sought to achieve an increase in the operability and long term functionality of the land, as well as adequate height clearance for occupants and required heavy vehicle circulation. No increase to gross floor area (GFA) is sought under the planning proposal.

Goodman met with City of Sydney Council (Council) officers on 24 July 2018 to discuss the initial concept to increase the Sydney LEP height limit within the site. Following this meeting, Council wrote to Goodman on 4 September 2018 describing the lodgement requirements for the planning proposal. Goodman has, through new building technologies, continued to observe a global increase in the height of industrial buildings and had a second meeting with Council on 20 November 2019 to discuss further plans for the site. Council provided a detailed letter dated 19 December 2019 with a site-specific checklist for the site.

This Planning Proposal Justification Report has been prepared by GHD Pty Ltd (GHD) on behalf of Goodman in accordance with Section 3.33 of the *Environmental Planning and Assessment Act 1979* (EP&A Act), the former Department of Planning and Environment's *A guide to preparing planning proposals* and *A guide to preparing local environmental plans* and the requirements of the Planning Proposal Lodgement Checklist issued by Council on 9 December 2019.

The site is unique in that the new St Peters Interchange that borders the site on two sides contributes to a dramatic change in the urban context from the current situation. Some of the new road structures are up to 22 metres high. The proposal responds to these significant new structures, and justifies an increased height as the current 18 metre height limit is based on the existing context which features significantly lower heights for nearby structures. Further the contextual absence of sensitive adjacent uses removes impact of overlooking and overshadowing often associated with increases in building height.

Conceptual architectural drawings have been developed to demonstrate the planning proposal and show three levels of warehousing with a centralised hardstand and driveway, accessed via a one-way circular ramp system, at either end of the facility. Each floor layout has been designed to provide maximum planning flexibility allowing for a variety of warehouse sizes with efficient and segregated loading areas. The complex would also include a six storey office building on the north-eastern end to provide flexible ancillary office working spaces and staff amenities for tenants of the facility.

The design facilitates access and egress for autonomous vehicles which caters for the future development of the freight industry. Additionally the design has considered incorporating the latest sustainable technology including: smart metering, solar photovoltaics, energy management, water harvesting and vehicle management.

The planning proposal aligns with the strategic direction of *A Metropolis of Three Cities – Greater Sydney Region Plan 2019* in that it plans for the retention and management of industrial land to create local employment opportunities. The proposal assists land use efficiency as it will enable the site to achieve its permissible 1.5:1 GFA, compared with the current 0.6:1 of the existing warehouse development. The site is located in close proximity to Sydney Airport, Port Botany and Cooks River Intermodal Terminal, key trade gateways. This location is a key employment district within the Eastern City and the Council is encouraged to retain and manage industrial spaces to foster economic activity and employment in the area.

The planning proposal is generally consistent with the Eastern City District Plan *Planning Priority E12 – Retaining and managing industrial and urban services land* given it is proposing to maintain the existing industrial use of the site as well as provide a contemporary adaptation of warehousing in the inner city through its innovative design. The proposal would provide land for a wide range of businesses that would support the city's productivity and integrated economy.

The planning proposal seeks to recognise the site's connection to nearby public transport and commercial hubs and the strategic potential of the site to be more productive, liveable and sustainable. Therefore, the planning proposal aligns with the policy. In this regard, the proposal is in line with the sustainability goals set out in the *Environmental Action 2016-2021 Strategy and Action Plan* (City of Sydney, 2017).

The proposal is an appropriate response to the changing land uses immediately adjoining the site, to the west and north, and will positively contribute to economic and social benefits for the wider LGA. The assessments accompanying the planning proposal demonstrate that the increased building height is unlikely to significantly impact on solar access to adjoining sites, key view corridors, traffic movement on Burrows and Canal Road and the amenity of the local environment. The proposal aligns with the State Government's and Council's strategic direction for the retention and management of industrial land. It is recommended that Council support the planning proposal request.

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1. Introduction

1.1 Background

Goodman Property Services (Australia) Pty Ltd (Goodman) is seeking approval to amend Clause 4.3(2) of the *Sydney Local Environmental Plan 2012* (Sydney LEP) to facilitate the redevelopment of a multi-level industrial and warehouse facility up to 30 metres (referred to as 'the planning proposal) at 1-3 Burrows Road, St Peters (the site). Whilst a multi-level industrial facility is currently permissible on the site, the amendment to the existing 18 metre maximum height limit planning control is sought to enable greater floor to ceiling heights to achieve an increase in the operability and long term functionality of the building as well as adequate height clearance for the required heavy vehicle circulation.

Conceptual architectural drawings have been developed to demonstrate the planning proposal and show three levels of warehousing with a centralised hardstand and driveway, accessed via a one-way circular ramp system, at either end of the facility. Each floor layout has been designed to provide maximum planning flexibility allowing for a variety of warehouse sizes with efficient and segregated loading areas. The complex would also include a six storey office building on the north-eastern end to provide ancillary flexible working spaces and staff amenities for tenants of the facility. Further detail on the proposal is provided in Section 3. Conceptual architectural drawings are provided in Appendix A.

The design facilitates access and egress for autonomous vehicles which caters for the future development of the freight industry. Additionally the design has considered incorporating the latest sustainable technology including: smart metering, solar photovoltaics, energy management, water harvesting and vehicle management.

Goodman has a strong history in multi-storey warehouse developments, particularly in Asia, and is seeking to satisfy the growing need for flexible and adaptable multi-storey industrial facilities in Sydney's south. The new state of the art multi-level warehouse building would be one of the first multi-level industrial facilities in Australia. The proposal is to be located on the corner of Canal and Burrows Road, Alexandria forming a significant, high quality landmark and gateway into the existing industrial precinct, which dates back some 100 years.

In December 2019, City of Sydney Council (Council) provided a project-specific Planning Proposal Lodgement Checklist which identified the required studies and reports to support the planning proposal request. Further detail regarding the consultation process and a summary of the checklist requirements and where they have been addressed is provided in Section 1.3.

1.2 Purpose of this report

This Planning Proposal Justification Report (the report) has been prepared to set out the intended effect of the proposed Sydney LEP amendment to the height limit planning control at the site. It includes:

- A description of the proposal
- Review of the applicable legislative framework and strategic context
- A preliminary assessment to determine the potential environmental impacts that may arise as a result of the proposal.

Where components of the report do not differ from the existing planning controls, they are not detailed within this document as they will be addressed as part of subsequent assessments.

The report has been prepared by GHD Pty Ltd (GHD) on behalf of Goodman (the proponent) in accordance with Section 3.33 of the *Environmental Planning and Assessment Act 1979* (EP&A Act), the former Department of Planning and Environment's *A guide to preparing planning proposals* and *A guide to preparing local environmental plans* and the requirements of the Planning Proposal Lodgement Checklist issued by Council on 9 December 2019 (refer to Section 1.3).

1.3 Pre-lodgement consultation

Goodman is the landowner of the site and has been planning the redevelopment of the site to accommodate a multi-level industrial facility for a number of years. Goodman met with Council officers on 24 July 2018 to discuss the initial concept to increase the height limit within the site. Following this meeting, Council wrote to Goodman on 4 September 2018 describing the lodgement requirements for the planning proposal. In the following 12 months, Goodman has continued to observe a global trend, local interest and requirement for multi-level industrial buildings and further developed the concept scheme in response to market feedback, innovative engineering workshops, and input from global multi-level experts within the Goodman network. A second meeting with Council was held on 20 November 2019 to discuss further plans for the site. Council provided a detailed letter dated 19 December 2019 with a site specific checklist for the site.

The letters from Council provided instructions for lodging a planning proposal, design excellence requirements and high-level guidance for the key matters that should be considered upon submission. The key matters raised by Council included traffic and access, sustainability and urban design. These key matters are addressed as follows:

- An Urban Design Report – the report assesses the impact of the increased height on the surrounding context, existing trees and the relationship of the proposed built form to the streetscape. The Urban Design Report is provided in Appendix B and has be summarised throughout this report.
- An Ecologically Sustainable Development Strategy (ESD) - The ESD strategy establishes a project specific ESD framework for the proposal and ensures it meets the highest standards with regard to current sustainable practice in the industrial space. Further details about the ESD are provided in Section 3.13 and Appendix C.
- A Traffic Assessment and Preliminary Travel Plan - the documents address the impacts created from the higher density use and associated increase in truck movements and staff trip generation. Council also commented on access from Burrows Road and the capacity of the existing road network to cater for the increase in vehicles entering and existing the site. Further details are provided in Section 6.3, Appendix D and Appendix E.

A summary of the checklist requirements and where they have been addressed is provided in Table 1.1.

Table 1.1 Planning Proposal Justification Report requirements

Item	Addressed
Outline the vision for the proposal	Section 3.2
Justify the proposal with reference to alternative options	Section 3.14
Outline how the planning proposal complies with and gives effect to the Greater Sydney Region Plan and the Eastern City District Plan	Section 4.1
Outline interactions with other key City of Sydney and NSW Government strategic documents, such as: • Sustainable Sydney 2030	Section 4.1

Item	Addressed
• Environmental Action 2016-2021 Strategy and Action Plan • Future Transport 2056 • Better Placed • Draft Greener Places	
Assess the planning proposal's compliance against existing planning controls, including: • Sydney Local Environmental Plan 2012 • Sydney Development Control Plan 2012 • State Environmental Planning Policy (State and Regional Development) 2011 • State Environmental Planning Policy (Infrastructure) 2007	Section 5
Provide draft planning controls for incorporation into Sydney LEP, including: • Zoning • Maximum building height • ESD targets	Sections 3.1, Section 5.2.1 and Appendix C
Develop a design excellence strategy in line with the requirements of section 3.3.2 of Sydney DCP 2012 and the City of Sydney Competitive Design Policy	Section 3.9 and Appendix C
Prepare an ecologically sustainable development (ESD) strategy with: • Commitments to achieve sustainability ratings benchmarks (Green Star, etc.) • Specific energy efficiency and on-site renewable power initiatives • Specific initiatives to achieve thermal comfort without reliance on heating or air conditioning • Specific water saving and rainwater capture initiatives • Consideration of the large rooftop area in achieving ESD outcomes.	Section 3.13 and Appendix C
LEP mapping sheet – current and proposed	Figure 3-1

2. The site

2.1 Site location and context

The site is in the City of Sydney Local Government Area (Sydney LGA) and borders the Inner West Council LGA to the west and south. Alexandra Canal, a tributary of Cooks River, is located approximately 85 metres to the south-east of the site. The locational context of the site is shown in Figure 2-1.

The site is surrounded by existing industrial and commercial development on the north-east, south-east and south-west.

The site is strategically located within close proximity to Sydney Airport and Port Botany. The Cooks River Intermodal Terminal, a container storage yard, is located about 100 metres north-west of the site. The WestConnex St Peters Interchange construction site is located immediately to the north and north-west of the site.

2.2 Site description

The site is legally referred to as Lot 11 DP 606737 and Lot 1 DP 1227450, 1- 3 Burrows Road, St Peters. The site is generally rectangular in shape with a slight curve along the Burrows Road frontage. The site has a total area of approximately 35,895 square metres. The eastern boundary of the site adjoins Burrows Road, with a frontage of 528 metres and the western boundary forms a secondary frontage to Canal Road of 289 metres. The existing development has a floor space ratio (FSR) of 0.6:1.

As shown in Photo 2-1, the site currently consists of old low rise industrial units which are consistent with the surrounding area that is largely industrial in nature. These industrial units are comprised of four large format steel framed warehouse/distribution buildings. The units are at the end of their life cycle and do not currently meet the requirements of industrial users in this market, reflected in the site being only 30 percent occupied. Current access is from driveways on Canal Road and Burrows Road, as shown in Photo 2-2.

The site has undergone many stages of building alterations, removals and additions. Previous land uses included production of packaging and warehousing. Historical uses also included above and below ground storage of petroleum hydrocarbons, inks, gases, adhesives and vehicle workshop(s). Existing contamination within the site is described in Section 6.7 and Appendix L.

Legend

- 1-3 Burrows Road (The site)
- Lot boundaries

Paper Size ISO A4

0 30 60 90 120

Meters

Map Projection: Mercator Auxiliary Sphere
Horizontal Datum: WGS 1984
Grid: WGS 1984 Web Mercator Auxiliary Sphere

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GHD

Goodman
Planning Proposal Justification Report
1-3 Burrows Road, St Peters

Project No. **12521130**
Revision No. **Final**
Date **02/ 03/ 2020**

Site location

FIGURE 3-1

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Print date: 02 Mar 2020 - 17:12

Photo 2-1 View looking south-east on Canal Road towards the existing site (Source: Google streetview)

Photo 2-2 View looking south-west towards the existing site entrance off Burrows Road

2.2.1 Traffic and access

The site is located at the junction of Burrows Road and Canal Road. Canal Road is a local road with four lanes of traffic (two in each direction) and a posted speed limit of 60 km/h. Canal Road connects the site to Mascot in the east, and the Princes Highway in the west, providing

connections to St Peters and Sydenham. Canal Road is a primary route for heavy vehicles and is noisy and inhospitable, as a result.

Burrows Road is a local road with two lanes of traffic (one in each direction) and a posted speed limit of 50 km/h in the vicinity of the site. Burrows Road connects the site directly to Sydney Park and Alexandria and is used to access businesses and industrial units fronting Alexandra Canal.

Traffic generation

Existing traffic flow surveys were conducted on Burrows Road and Canal Road on Thursday, 17 May 2018. The surveys were conducted in both the AM and PM peak periods. Results from the survey found that Burrows Road currently carries approximately 540 trips per hour for both AM and PM peak periods within the vicinity of the site.

Crash data made available from Transport for NSW's (TfNSW) Centre for Road Safety Website suggests that four accidents occurred at the T-intersection of Campbell Road and Burrows Road between 2014 and 2018. This intersection is proposed to be upgraded to a four-way intersection with left-in/left-out access to Burrows Road as part of the New M5 motorway project. This is expected to improve road safety within the site area.

Public and active transport

The site is currently well serviced by existing public transport services. Bus services operate within close proximity of the site. Two bus stops on Canal Road are within a 400 metres radius of the site. These two stops are serviced by the 418 bus route, which operates from Kingsford to Burwood via Mascot, Sydenham and Dulwich Hill.

There are additional bus stops within an 800 metre radius of the site which provides further access to the CBD, Kogarah and Stanford Plaza.

The site is located between Sydenham and Mascot train stations, with Sydenham Station located approximately two kilometres to the west, and Mascot Station one kilometre to the south-east of the site. Sufficient pedestrian facilities are available, allowing for an approximate 10 and 20 minute walking time to the stations.

Active transport links are also available to the site in the form of pedestrian footpaths and cycling routes. Footpath access is currently provided on both sides of Burrows Road and Canal Road. Intersections on both of these roads provide several pedestrian crossings, allowing for a good level of access to the site.

Access to the site via cycling facilities is currently limited. It should be noted however that the New M5 project will introduce off-road shared cycleways on both Canal Road and the St Peters Interchange. These will link to existing cycleways established near Mascot Station and Sydney Park, and will create greater opportunities for cyclists to access the site.

Local public transport and active transport links in proximity to the site are illustrated on Figure 2-2.

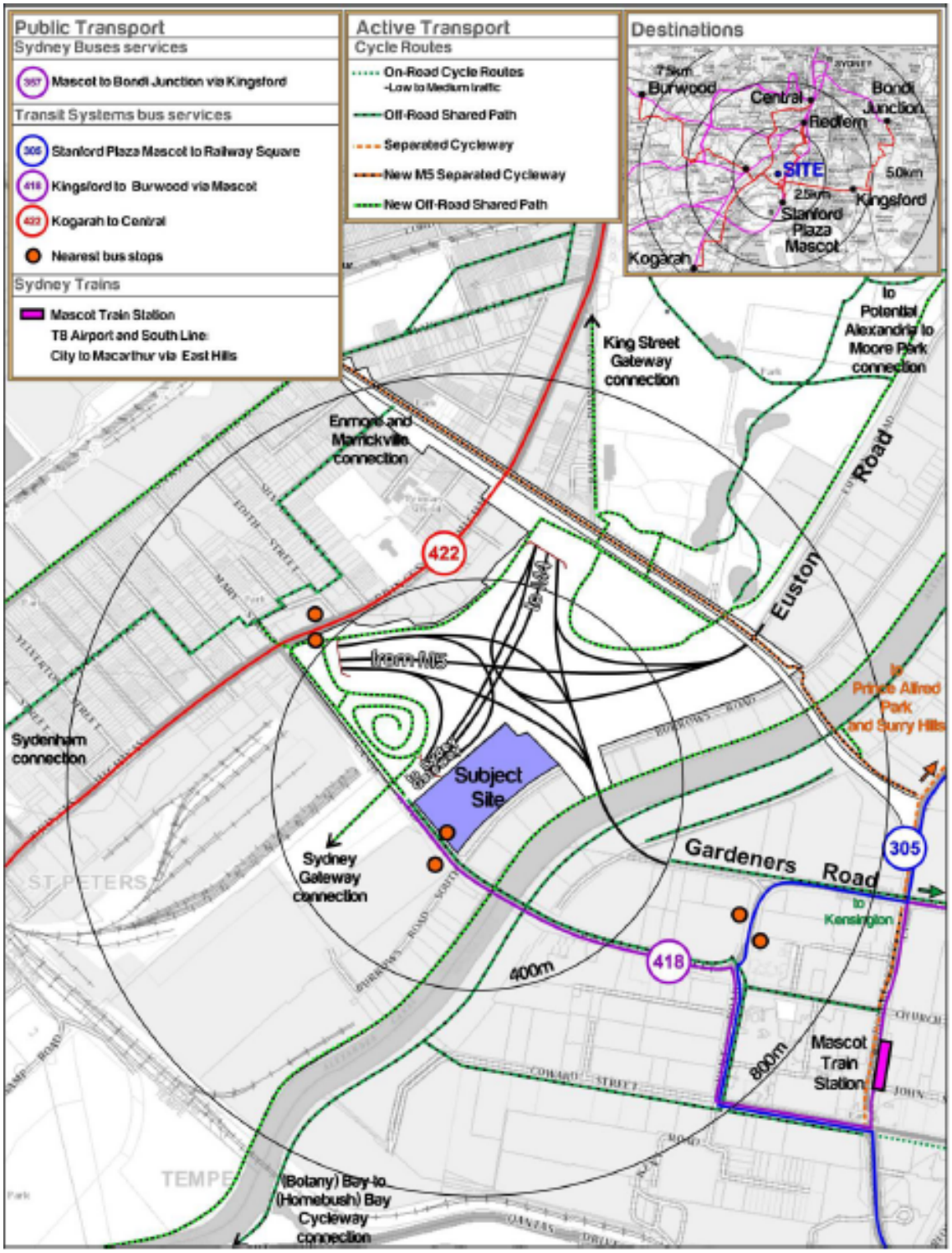


Figure 2-2 Public transport network (Ason Group, 2020)

Existing vehicular access

Two direct access points into the site are located off Burrows Road, as shown in Figure 2-3. All Vehicular access to the site is via Gate 01 and Gate 02 is currently fenced off.

Figure 2-3 Existing access arrangement (Ason Group, 2020)

2.2.2 Heritage

A search of the NSW State Heritage Register, *Marrickville Local Environment Plan 2011* and Sydney LEP did not identify any heritage items on the site or on any adjacent land. The closest registered heritage item, Alexandra Canal, is located about 100 metres east of the proposal, and is situated at an adequate buffer distance as to not be impacted.

2.3 Future context

The site is strategically located and linked to Sydney's main trade gateway. The following two major infrastructure projects are proposed or currently under construction directly adjacent to the subject site:

- Sydney Gateway Road Project (proposed) – which seeks to build a new, direct road connection between the Sydney motorway network at the St Peters interchange, to Sydney Airport and Port Botany
- The St Peters Interchange, a part of WestConnex New M5 project – currently under construction. The project will provide connectivity to the new M5, the M4 corridor and local connectivity to surrounding suburbs such as Alexandria and Mascot.

These projects will provide substantial additional capacity in and out of the Sydney Airport and Port Botany precinct, allowing airport and port traffic to avoid local arterial roads when accessing the broader Sydney motorway network.

Changes to the surrounding landscape as a result of these projects is discussed below.

2.3.1 WestConnex St Peters Interchange

The WestConnex St Peters Interchange which is currently under construction constitutes a dramatic change in the urban context directly adjacent to the site. The interchange is comprised of multiple new roads and bridge structures at varying heights, with some being underground, and others up to 22 metres in height above ground. The proposal will respond to these significant new structures directly adjacent to the north-east and north-west facing boundaries.

As part of these works a new flyover structure linking St Peters Interchange and Mascot is being built, which will bridge over the Alexandra Canal and Burrows Road. This new structure runs alongside the north-east site boundary. The new interchange will also feature extensive new planting and trees within a number of new publicly accessible open spaces. One of these new open spaces features a 24 metre high viewing mound which is located adjacent to the west of the site fronting Canal Road.

2.3.2 Proposed Sydney Gateway Road Project

The proposed Sydney Gateway Road Project is a new high capacity road link that will connect the new St Peters Interchange to the Sydney Airport domestic and international terminals and Port Botany. As part of these works a new bridge will be constructed over Canal Road, linking with the new St Peters Interchange road structures running alongside the North-West facing site boundary.

The Environmental Impact Statement/preliminary draft Major Development Plan has been prepared and a Response to Submissions report is currently being prepared for the project. If the project is granted approval, construction is proposed to commence in mid-2020 and would take about 3.5 years to complete.

2.3.3 Other planned developments

Other developments proposed within the immediate vicinity of the site include the construction of two 7-storey buildings for self-storage units at 1-3 Ricketty Street, Mascot. The proposed buildings are both 27.5 metres high and front Alexandra Canal. The development application for this site was approved by Bayside Council in May 2018.

3. The proposal

3.1 Proposed planning controls

This planning proposal seeks to change the maximum building height onsite from 18 metres to 30 metres under the Sydney LEP. Figure 3-1 shows the current Sydney LEP maximum building height for the site and the proposed maximum building height. Table 3.1 details other planning controls that apply to the site under the Sydney LEP.

Table 3.1 Planning controls

Planning control	Existing controls	Proposed controls
Zoning	IN1 General Industrial	IN1 General Industrial
FSR	1.5:1	1.5:1
Height limit	**18 m**	**30 m**

3.2 Vision for the proposal

The proposal will transform the site into a functional and adaptable multi-storey industrial and warehouse building.

3.3 Objectives

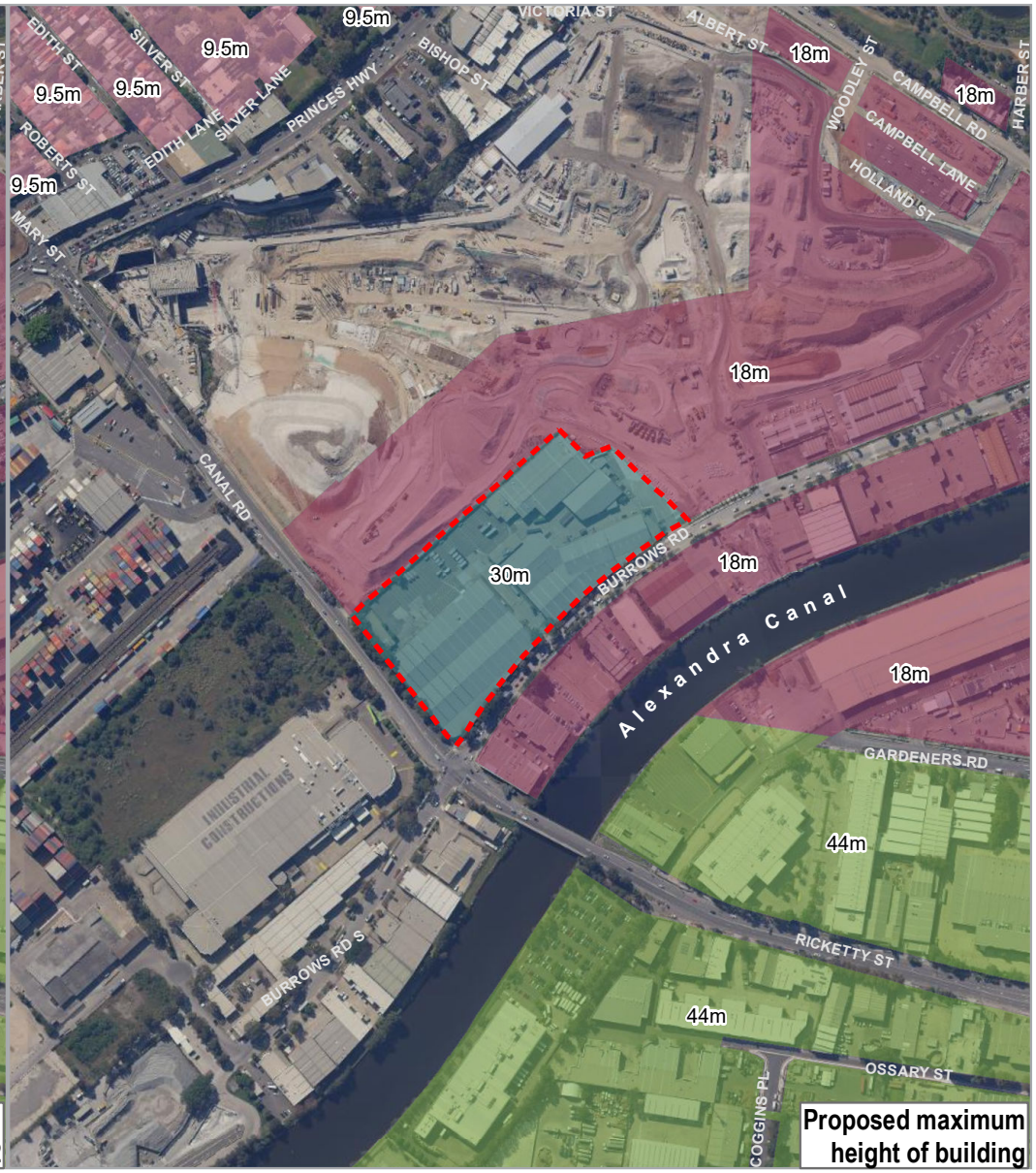
The planning proposal will enable a functional and adaptable industrial redevelopment of the existing warehouse facility. The main objectives of the redevelopment are to:

- Retain industrial and urban services land and support industrial expansion in an appropriate location
- Facilitate the intensification of industrial land use in response to increasing land values
- Enable the site to achieve the permissible FSR of 1.5:1, thereby ensuring enhanced land use efficiency
- Provide a flexible design to provide for a combination of customer types comprising of e-commerce, ancillary office spaces, a cafe and gym in addition to storage units
- Become an integral part of the supply chain and the last mile delivery
- Build upon strong e-commerce drivers close to Sydney Airport, Port Botany, Cooks River Intermodal Terminal and the CBD
- Contribute to increased employment generation in an accessible location
- Incorporate innovative design principles consistent with global industrial / warehouse trends
- Provide a highly sustainable design incorporating latest technology such as solar photovoltaics (PV), water harvesting, vehicle management, energy management and smart metering.

The project also aims to contribute to the improvement of the urban environment by ensuring that it is:

- Aligned with precinct pedestrian and cycling strategies
- Aligned with growth in transport, social and green infrastructure

- Innovative in providing recreational and open space areas, and increasing urban tree canopy
- Responsive to climate change and natural and urban hazards.



Legend

The site

Building Height (m)

- 9-9.9
- 17-18.9
- 30-34.9
- 40-44.9

Data Disclaimer

Paper Size ISO A4

0 40 80 120 160

Meters

Map Projection: Transverse Mercator
Horizontal Datum: GDA 1994
Grid: GDA 1994 MGA Zone 56

N

Goodman
Planning Proposal Justification Report
1-3 Burrows Roas, St Peters

Current and proposed maximum height of building

Project No. **12521130**
Revision No. **Final**
Date **04/ 03/ 2020**

FIGURE 4-1

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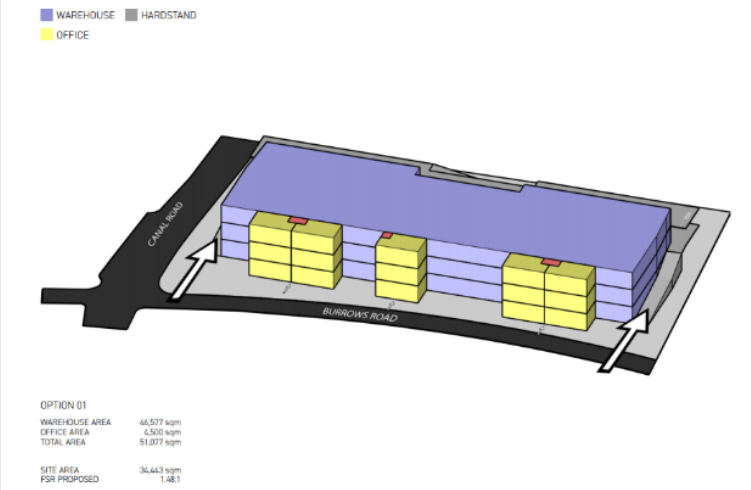
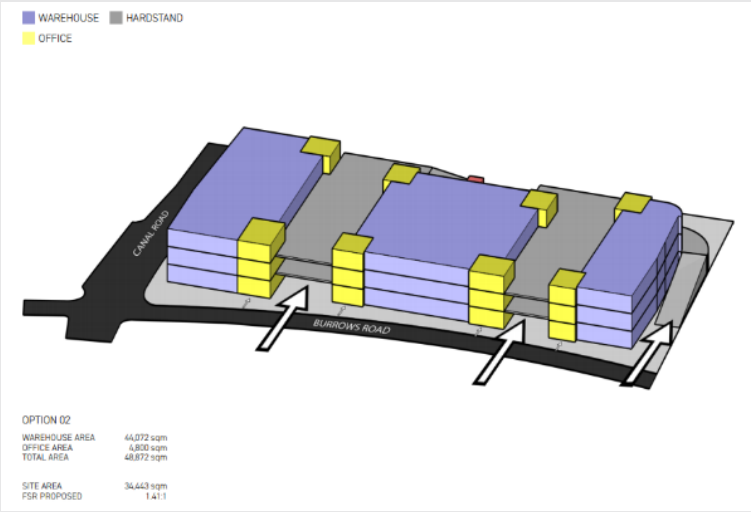
Print date: 04 Mar 2020 - 10:41

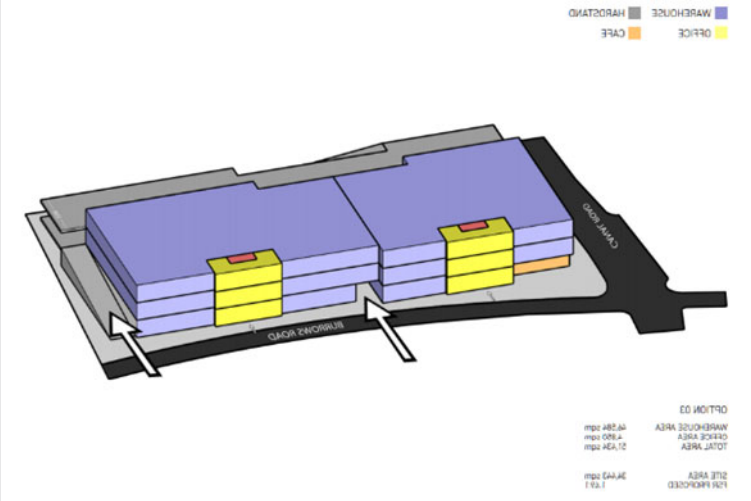
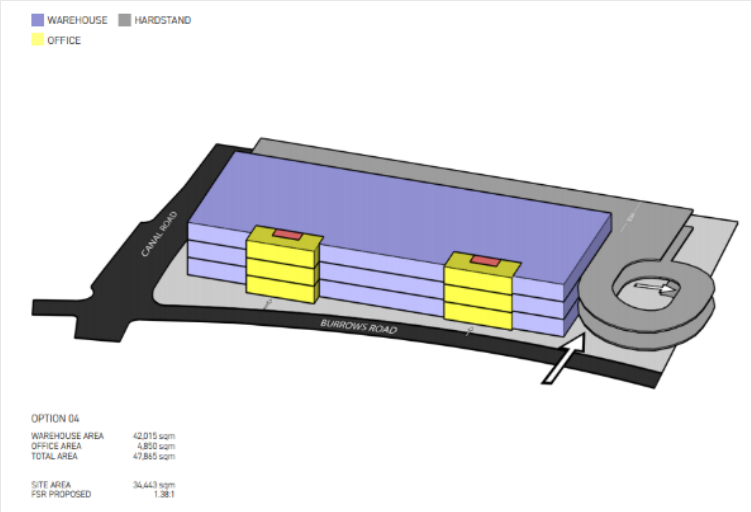
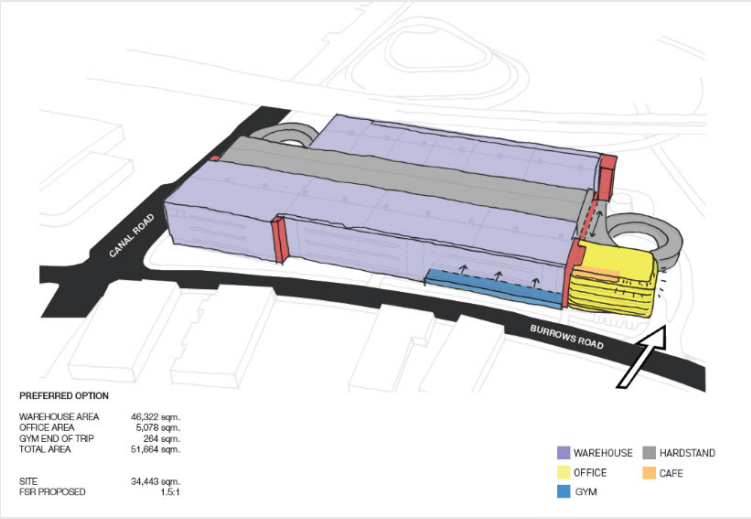
Data source: Sources: Esri, HERE, Garmin, Intermap, increment P Corp., GEBCO, USGS, FAO, NPS, NRCAN, GeoBase, IGN, Kadaster NL, Ordnance Survey, Esri Japan, METI, Esri China (Hong Kong), (c) OpenStreetMap contributors, and the GIS User Community. © State Government of NSW and Department of Planning, Industry and Environment 2008. Created by: lmanasan

3.4 Design options

Five concept design options have been considered for the redevelopment of the site. These are described in Table 3.2.

Table 3.2 Overview of concept design options

Option	Schematic
Option 1	
Option 1 has a FSR of 1.48:1. The proposed warehouse area is 46,577 square metres and office area 4,500 square metres giving a total area of 51,077 square metres. Two heavy vehicle access points are provided off Burrows Road at the eastern and western ends of the site. The three office blocks face Burrows Road.	
Option 2	
Option 2 has a FSR of 1.41:1. The proposed warehouse area is 44,072 square metres and the office area is 4,800 square metres, giving a total area of 48,872 square metres. The option includes three heavy vehicle access points off Burrows Road and eight office blocks located off each internal corner of the complex.	

Option	Schematic
Option 3	
Option 3 has a FSR of 1.49:1. The warehouse area proposed is 46,584 square metres and an office area of 4,850 square metres, giving a total area of 51,434 square metres. There are two heavy vehicle access points off Burrows Road and two office blocks that face Burrows Road.	
Option 4	
Option 4 has a FSR of 1.38:1. The warehouse area proposed is 42,015 square metres and an office area of 4,850 square metres, giving a total area of 47,865 square metres. This option has a two way-ramp system to access all three levels of the building with employee parking on the eastern side. There are two heavy vehicle access points off Burrows Road and two office blocks that face Burrows Road.	
Option 5	
Option 5 has a FSR of 1.5:1. The warehouse area proposed is 46,322 square metres, an office area of 5,078 square metres and a gym/end of trip area of 264 square metres, giving a total area of 51,664 square metres. This option has two one way-ramps to access all three levels of the building with a separate entrance off Burrows Road for the basement car park for employees. There is one heavy vehicle access point off Burrows Road and one centralised block that faces Burrows Road.	

3.6 Options analysis

The preferred option has been determined through a rigorous analysis of the pros and cons of urban design principles of the site, operational requirements and efficiencies through market engagement, structural workshops and innovation development with local suppliers and manufactures, and Goodman's significant global experience developing multi-storey warehousing.

A comparison of the different options is provided in Table 3.3. Based on the analysis, Option 5 was considered to be the preferred option and forms the basis of the Planning Proposal.

Table 3.3 Options analysis

Option	Pros	Cons
Option 1	• Well articulated streetscape with multiple entrances on Burrows Road. • Offices on Burrows Road creates a more human scale facing the street.	• Produces taller building due to large roof span • Warehouse sizes and allocation inflexible due to fixed and separated office locations • Straight ramp along entire Canal Road frontage has a negative impact on the streetscape • Heavy vehicle access too close to the intersection of Burrows Road and Canal Road • Ramp system complicated and access to level 3 difficult and dangerous as trucks are required to turn in close proximity to trucks unloading goods at docks • Parking on the eastern side, access conflicting with ramp • Creates an unarticulated back and exposed loading docks at the rear of the building. • Disconnected offices and amenities providing substandard overall customer offering • Produces taller building due to higher floor to floor requirements for typical users of this type of warehouse design.
Option 2	• Multiple entrances on Burrows Road provides street level activation and articulation at the roof level • Offices on Burrows Road create a more human scale facing the street.	• Building has a relatively monolithic appearance along Canal Road as massing presents little opportunity for articulation • No flexibility in warehouse allocation as each is attached to a specific office and some office spaces receive lower levels of natural light and ventilation • Multiple heavy vehicle access points along Burrows Road increases number of pedestrian wayfinding issues • Loading areas are visible from public realm • Ramp system complicated and access to level 3 difficult • Parking on the eastern side, access conflicting with ramp

Option	Pros	Cons
		• This configuration requires a mix of cars and truck access to the hardstand and areas.
Option 3	• Well articulated streetscape with multiple entrances on Burrows Road • Cafe activates corner of Burrows Road and Canal Road • Offices on Burrows Road creates a more human scale facing the street.	• Produces taller building due to large roof span • Layout more consistent with larger warehouse users which are not typical of the St Peters / Alexandria market. These users would prefer cheaper warehousing in periphery markets • Cafe on noisy street corner • Ramp system complicated and access to level 3 difficult as trucks are required to turn in close proximity to trucks unloading goods at docks • Parking on the eastern side, access conflicting with ramp creates an unarticulated back to the building • Produces taller building due to higher floor to floor requirements for typical users of this type of warehouse design.
Option 4	• Multiple office entrances on Burrows Road provides street level activation • Offices on Burrows Road creates a more human scale facing the street • Simple two-way ramp system with single point of access for heavy vehicles.	• Produces taller building due to large roof span • Layout more consistent with larger warehouse users which are not typical of the St Peters / Alexandria market. These users would prefer cost effective warehouses in outer markets • Parking on the eastern side, access conflicting with ramp • Creates an unarticulated and exposed loading docks at the rear of the building • Produces taller building due to higher floor to floor requirements for typical users of this type of warehouse design.
Option 5 (preferred option)	• Total length of active frontage is the same as in Option 1, and more than in Options 2, 3, and 4 • Layout provides a high degree of flexibility with warehouse sizes and allocation. • Central hardstand is efficient and permits fenestration on all sides of building • Single point of access for heavy vehicles with separate access for cars • Offices and active frontages are away from the harsh intersection of Canal and Burrows Rd providing greater opportunity for harmonious use of facilities • Offices benefit from natural light all day long and has both city and canal views from cafe and roof terrace	• No active frontage at the corner of Burrows Road and Canal Road.

Option	Pros	Cons
	• Distinct office element with shared social spaces creates a more collaborative environment with a quality arrival experience • Highly efficient structural layout provides opportunity to articulate elevations with various material treatments car spaces are centrally located and more safely accessible from all occupied tenancy areas	

3.7 Overview of the proposal

The proposal consists of:

- Three levels of warehousing with a centralised hardstand and driveway, accessed via a one-way circular ramp system, at either end of the facility
- A six-storey A-grade commercial office on the north-eastern end of the building providing flexible working spaces along with all required staff amenities for tenants of the building
- Amenities for staff including a café on the top floor of the office benefiting from the north-east aspect and extensive inner city and district views
- Underground parking
- Access off Burrows Road with a separate single entry and exit driveway proposed for both cars and trucks
- Truck access at the north-eastern corner of the site with right in / out and left in / out required for efficient access to the facility. Circulation through the facility for all truck movements would be via a one-way system designed to provide unrestricted and efficient access at all times. The dual sided loading configuration maintains an unencumbered central access driveway throughout the building. The centralised nature of the hardstands also provides exceptional weather cover and forms an acoustic buffer for surrounding developments.

The proposal will have a maximum height of around 29.5 metres and the maximum building height sought for under Sydney LEP is 30 metres. This has allowed a 0.5 metre buffer as requested by Council to allow for any minor adjustments should they be required.

Offices included within the concept plan are necessary to the warehouse units on-site and will only be used by warehouse tenants of the proposal.

Conceptual architectural drawings for the preferred option are shown in Appendix A.

The overall design will use architectural elements that blend and enhance the architecture of the surrounding streetscape. Common industrial finishes such as vertical ribbed colorbond cladding, off form precast concrete, horizontal glazing, and aluminium louvers work together to provide a consistent architectural language.

A minimum six metre wide landscape setback has been provided along both the Canal and Burrows Road frontages. A deeper setback on the corner of Canal and Burrows Road allows for more extensive landscaping and improves the sight lines for vehicles navigating the corner. Extensive landscape areas are proposed throughout the site to provide further amenity for the building's occupants. A comprehensive landscape plan will be provided to further enhance the existing surrounding environment.

3.7.1 Proposed access and parking

Access

As shown in Appendix D, truck access is proposed from Burrows Road at the north-eastern end of the site. Access to the underground car parking area is proposed mid-way along the Burrows Road frontage. Vehicle access to the at-level visitor parking is proposed on the north-eastern end of the property. Emergency/ fire access is proposed from Canal Road and will not allow for any normal operational egress from this point.

The maximum length vehicle accessing the site is a B-double of 26 metres in length. All vehicles will be able to enter and exit the site in a forward direction.

Parking

Parking will be provided consistent with the requirements of the Sydney LEP. The indicative development plan provides a total of 311 parking spaces for the site, of which eight are accessible parking spaces.

Sydney DCP 2012 also provides further parking rates for motor bike and bicycle parking. The final design as a part of the DA will incorporate these additional requirements, ensuring full compliance with the DCP.

Pedestrian access

A pedestrian-only access will be provided off Burrows Road into the offices. The pedestrian-only access is in accordance with the provision outlined in Sydney DCP.

Further assessment will be undertaken of the final design as a part of the DA to ensuring that pedestrian access is compliance with the DCP.

3.8 Urban design

The planning proposal is supported by an Urban Design Report, provided in Appendix B. The Urban Design Report contains a conceptual built form to illustrate future development outcomes based on the proposed building height and identified urban design features and impacts of the proposal. The urban design vision and objectives for the proposal were framed consistent with key guidelines and policies.

The Urban Design Report tests a number of building envelope scenarios based on the potential 29.5 metre maximum building height and floor space ratio of 1.5:1 proposed for the site and includes a review of all the design options and the urban design principles that underpin the proposal. The findings of the urban design report have been incorporated in relevant sections of this report.

A key view analysis is provided in Section 6.2, the analysis demonstrates that the proposed height increase would not negatively impact viewpoints towards the site or along the canal towards the city.

3.9 Design excellence strategy

A Design Excellence Strategy for the proposal has been prepared by GHD on behalf of the proponent (Appendix F). The strategy has been prepared in order to establish a process that secures a high quality design and built outcome for both the proponent and the broader community.

The Sydney LEP requires a competitive design process to be undertaken by way of demonstrating design excellence where a building is over 25 metres in height outside central Sydney or has a capital investment value of over $100,000,000. The site's location, industrial

zoning and the functional parameters of the proposed development, are conditions that are generally not associated with such a competitive design process.

As an alternative to the competitive design process, the proponent proposes to undertake an independent peer review process to identify potential changes that may improve the design excellence of the development. Additionally, the proponent intends to engage directly with Council in the application of this process, thereby providing an additional community-centric contribution to the eventual built outcomes. It is envisaged that the peer review process will commence as soon as practical prior to any detailed DA and ensure that:

- Design excellence is achieved through the peer review process for the development
- The development individually and collectively contributes to the architectural and overall urban design quality of Council
- Architectural design variety is balanced with the functional requirements and engineering requirements of the development
- The development appropriately responds to its logistics functions and infrastructure network context
- The justification for additional building height by demonstrating design excellence through the process
- The target benchmarks for ecologically sustainable development are considered.

The independent peer review process is outlined below:

- To be undertaken by one (1) to three (3) appropriately experienced architects
- The election of the peer review architect(s) is made in consultation with Council
- The brief that will inform the Peer Review Process is to be made in consultation with Council
- The brief should protect the functionality of the development and target elements with the flexibility for improvement
- The brief should have regard to the industrial nature of the development and the importance on structural design on achieving design intent.

3.10 Landscape plan

A Landscape Plan has been prepared for the project and is attached in Appendix G. The plan details the proposed landscaping with the aim to:

- Provide a sustainable landscape outcomes, such as; low water use species, sustainable and local hardscape materials
- Aid in retaining and protecting as many existing trees as possible
- Investigate water life cycle (WSUD) where possible, such as rainwater harvesting
- Provide amelioration of views in/ out of site through planting design and specification
- Create an attractive, and amenable working environment
- Create and add to local ecology, through introduction of flora
- Adhere to relevant guidelines and controls.

3.11 Public art

A Public Art Strategy for the proposal has been prepared to meet the requirements of the Sydney DCP 2012 and *Interim Guidelines - Public Art in Private Developments*. The Strategy provides an analysis of the site's locality and public art opportunities. Research was undertaken into the site and local themes, history and features of the area which was used to inform initial artwork concept formulation, and selection and development of a preferred artwork. A full copy of the public art strategy is included in Appendix H.

3.12 Preliminary travel plan

Ason Group was engaged to prepare a Preliminary Travel Plan for the proposal. A full copy of the assessment is attached as Appendix E. The travel plan reviewed strategic plans relevant to the area as well as an assessment of existing infrastructure associated with car sharing and green transport. The travel plan intended to develop site-specific measures to promote and maximise the use of sustainable travel modes, including walking, cycling, public transport and car sharing. In this regard, this plan sets out objectives and strategies to assist the Council in achieving its goal to improve sustainability.

3.13 Ecologically sustainable development

An Ecologically Sustainable Development (ESD) context analysis and strategy has been prepared to establish a project specific ESD framework for the proposal (as shown in Appendix C). A context analysis of the site location, climate and applicable policies and planning controls has been undertaken to identify key sustainability themes and objectives. The project specific ESD framework has been developed to capture the key overarching requirements and put in place structure to guide the consideration and implementation of best practice ESD features into the future design stages of the proposal.

On the basis of the review and assumption that the sustainability framework will be followed for future stages of the development, the proposal would be capable of including best practice initiatives and meeting the requirements of current planning controls and the intent of wider policies.

The ESD strategy aims to integrate Goodman's own sustainability strategy requirements alongside the objectives of the broader NSW and Council policies and planning controls. The context analysis identifies the relevant themes, objectives and targets drawn from the various policies and planning controls including sustainability related items. These have been used to develop a project specific framework that outlines mechanisms for guiding and integrating ESD and sustainability principles throughout the remainder of the project design and delivery stages to improve environmental performance.

3.14 Proposal justification

3.14.1 Strategic location

As detailed in Section 4.1, the proposal is consistent with the direction of strategic plans such as the *Eastern City District Plan: connecting communities* (Greater Sydney Commission, 2018) and the *City of Sydney City Employment Lands Strategy 2014-2019* (City of Sydney, 2014) which emphasise the management, retention and provision of industrial land for strategic industrial activity. These objectives are completed in the interest of continued economic growth of the Sydney region.

The Eastern City District is currently becoming more innovative and globally competitive, in order to meet the needs for the Greater Sydney Plan, which identifies the shortage of industrial

and urban services land in the area. A key action is to retain and support industrial expansion in appropriate locations. The site is strategically located at the centre of three key distribution hubs - Sydney Airport, Port Botany and the Cooks River Intermodal Terminal and the proposal is consistent with the current industrial zoning.

The site is particularly suited for intensification given its high level of connectivity and access to main distributor roads for heavy vehicles. It is also reasonably accessible from a number of nearby stations and is served by a bus route with a stop directly adjacent to the site. The location will enable the development to become an integral part of the inner-city supply chain and last mile delivery.

3.14.2 Employment benefits

The construction and operation of a multi-storey facility will result in the creation of about 370 employment opportunities in the Eastern City District. Additionally, the jobs will be located in an accessible area. The auxiliary office space will be used to accommodate administration staff for the proposed warehouse facilities. Staff amenities for the site include a gym and end of trip facilities exclusive to the occupants of the facility.

3.14.3 Innovative high density warehousing

There is an increasing trend globally to construct high density warehouses. The increase in height will enable Australia to be at the forefront of the warehousing industry as well as maximising the use of space and emerging technologies on the field. The design demonstrates a consistency with global industrial and warehouse trends. Goodman owns and manages 15 multi-level industrial facilities globally with a further 14 under construction or awaiting planning approval within major global gateway cities including Hong Kong, Shanghai, Tokyo, Osaka and Barcelona. These facilities consist of multi-storey warehouses with ramps ranging from two (2) to twenty-two levels (22) levels and with excellent staff amenities.

The multi-storey industrial and warehouse building provides high density industrial land use that responds to the demand for and recent reduction of IN1 zoned land in South Sydney, and increasing land values. Through this it will enable a larger number of smaller tenancies with flexibility of catering for future automation and larger customers.

Additionally, the proposal would cater for modern technologies that provide both economic and sustainable outcomes. The design facilitates access and egress for autonomous vehicles which caters for the future development of the freight industry. Additionally, the design has considered incorporating the latest sustainable technology including:

- Smart metering
- Solar photovoltaics
- Energy management
- Water harvesting
- Vehicle management.

3.14.4 Environmental benefits

The subject site is located in a previously disturbed industrial area and therefore will have minimal environmental impacts associated with construction and operation. Preliminary specialist assessments have been undertaken to assess the impact of the proposal on traffic, flooding, contamination and visual amenity. Additionally, assessments have been undertaken to find pathways to achieve positive impacts on the local environment.

The draft *Greener Places* (Government Architect, 2017) and the *Environmental Action 2016-2021 Strategy and Action Plan* (City of Sydney, 2017) are particularly relevant to the proposal's sustainability and green infrastructure targets. The proposal aims to produce a development in line with the sustainability goals set out in the *Environmental Action 2016-2021 Strategy and Action Plan* (City of Sydney, 2017). Additionally, the proposal aligns with the plan's aim to increase green space through the retention and implementation of green infrastructure on-site in compliance with the draft Greener Places policy. The enhanced land use efficiency proposed through the consolidation of industrial uses over a smaller area leads to reduction in urban sprawl.

4. Strategic policy context

4.1 Strategic planning context

4.1.1 A Metropolis of Three Cities - Greater Sydney Region Plan

A Metropolis of Three Cities – Greater Sydney Region Plan 2019 provides a 40 year vision and 20 year plan for Greater Sydney and was finalised in March 2018 by the Greater Sydney Commission.

The plan outlines the vision, objectives, strategies and actions for developing a three city metropolis model for Greater Sydney comprising the Western Parkland City, the Central River City and the Eastern Harbour City.

The plan provides a vision for 2056 based on the '30 minute city' concept across greater metropolitan Sydney, allowing people to live, work and access amenities within close distances of each other. The plan also advocates for the planning, retention and management of industrial land to create local employment opportunities.

The Planning Proposal is generally consistent with the strategic direction of the plan.

4.1.2 Eastern City District Plan

The City of Sydney LGA is located within the Eastern City District along with Bayside, Burwood, City of Canada Bay, Inner West, Randwick, Strathfield, Waverly and Woollahra LGAs. The *Eastern City District Plan 2018* is a 20 year plan to manage growth and meet the actions and priorities of the *Greater Sydney Region Plan*.

St Peters, the suburb in which 1-3 Burrows Road is located, is an inner-west suburb of Sydney. Located in the Eastern Harbour City, which is one of the three main cities envisioned by the Greater Sydney Plan. The site is in an area mapped as industrial and urban services land as shown in Figure 4-1. With manufacturing and retail trade being the dominant industries of the area, there is now considered to be a shortage of industrial and urban services in the Eastern Harbour City. This is largely due to the conversion of industrial land to mixed-use residential zones, as a result of the district plan aim to maximise the utilisation of the remaining land zoned as general industrial.

Under the Eastern City District Plan*, Planning Priority E12 – Retaining and managing industrial and urban services land* outlines the important uses and key aspects of industrial and urban services land in the area. The site is in close proximity to Sydney Airport, a key trade gateway. This location is a key employment district within the Eastern City and local councils are encouraged to retain and manage industrial spaces to foster economic activity and employment in the area. The key actions for Council and other planning authorities under Planning Priority E12 are shown Table 4.1.

The Planning Proposal is generally consistent with *Planning Priority E12* given it is proposing to maintain the existing industrial use of the site as well as provide a contemporary adaptation of warehousing in the inner city through its innovative design. The proposal would provide land for a wide range of businesses that would support the city's productivity and integrated economy.

The development also aligns with other Planning Priority that are outlined in the Eastern City District Plan. Table 4.1 details the relevant Planning Priority applicable to the site and how they are addressed as part of the development.

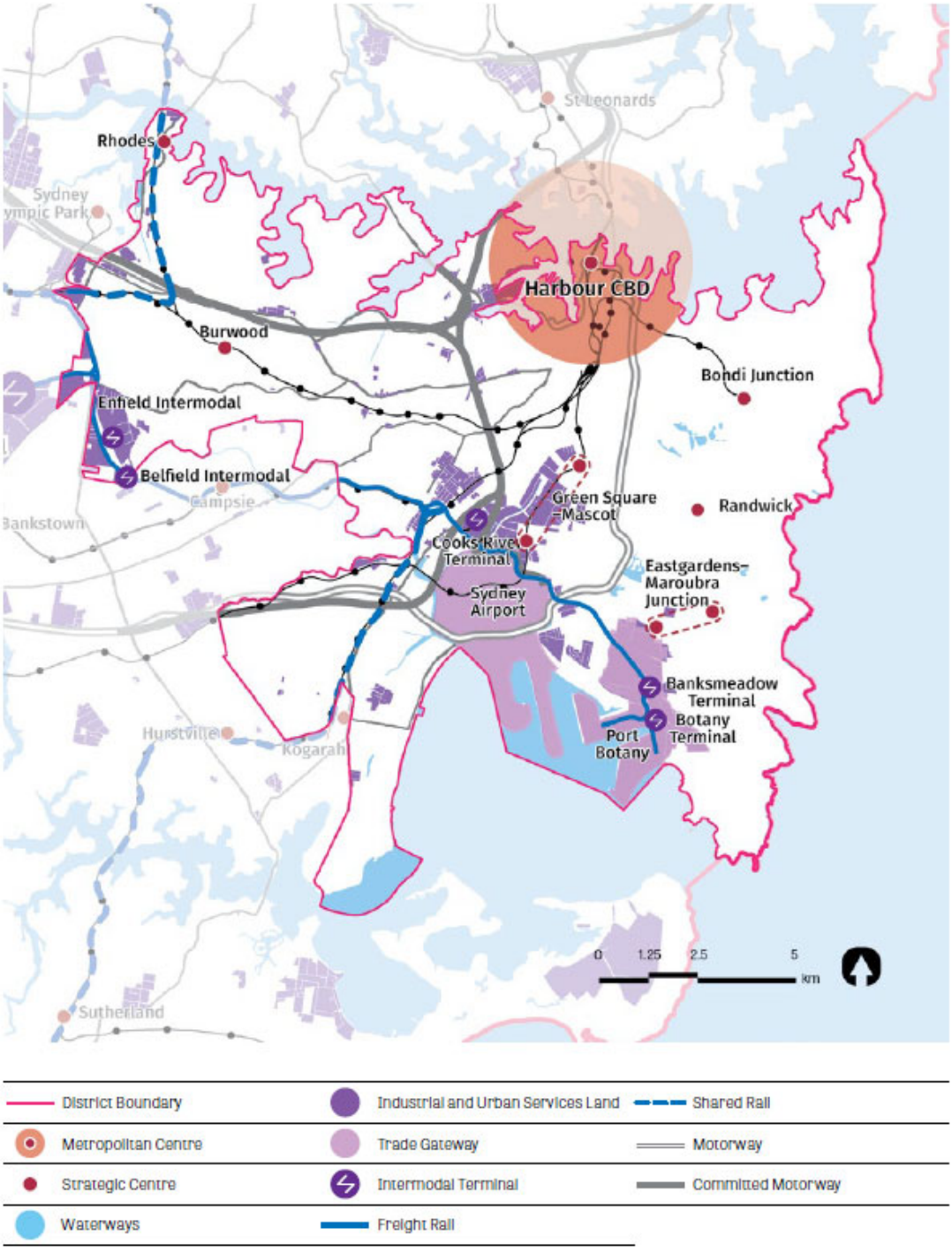


Figure 4-1 Eastern City District industrial and urban services land and freight assets (Greater Sydney Commission, 2018)

Table 4.1 Eastern City District Plan key actions

Planning Priority	Action	Comment
Productivity		
E9 Growing international trade gateways	• Manage the interfaces of industrial areas, trade gateways and intermodal facilities through land use activities by retaining industrial lands for port, intermodal and logistics uses, • Protect and grow the trade gateways by identifying and retaining strategically important employment and urban services land in and near Sydney Airport precinct • Optimise the efficiency and effectiveness of the freight handling and logistics network by balancing the need to minimise negative impacts of freight movements on urban amenity with the need to support efficient freight movements and deliveries and limiting incompatible uses in areas expected to have intense freight activity.	• The proposal forms a significant landmark and gateway into an existing industrial precinct. The proposed design reflects high grade commercial and industrial standards and is responsive, sensitive and relevant to the local industrial area. • Whilst the proposal relates to the existing context of the site as an important employment area, the design also acknowledges the significant environmental changes that are currently happening in the area, with two major infrastructure projects directly adjacent to the site, WestConnex and Gateway. • The design maximises the utilisation of a key site within an existing industrial area that is highly connected and will become an integral part of the supply chain.
E10 Delivering integrated land use and transport planning and a 30-minute city	• Support innovative approaches to the operation of business, educational and institutional establishments to improve the performance of the transport network. • Plan for urban development, new centres, better places and employment uses that are integrated with, and optimise opportunities of, the public value and use of Sydney Metro City & South West, CBD and South East Light Rail, and WestConnex as well as other city shaping projects. • Investigate and plan for the land use implications of potential long-term regional transport connections.	• The project provides significant employment opportunities and is easily accessible by public transport. Additionally, the Travel Plan outlines how the site can utilise and encourage the use of multiple forms of transport in the local area. • The project will utilise the proximity of WestConnex, a city shaping project.
E11 Growing investment, business opportunities and jobs in strategic centres	• Provide access to jobs, goods and services in centres by attracting significant investment and business activity in strategic centres • To provide job growth • Create new centres in accordance with the Principles for Greater Sydney's centres. • Review the current planning controls and create capacity to achieve the job targets for each of the District's strategic centres.	• The project proposal to maintain the industrial use of the area • The construction and operation of a multi-storey warehouse building will significantly contribute to the job target of 80,000 by 2036 in the Mascot Green square area.

Planning Priority	Action	Comment
	• Prioritise strategic land use and infrastructure plans for growing centres • Meet job target for 2036 of 80,000 in the Mascot Green square area • Retain and manage surrounding employment, industrial and urban services lands in the Mascot Green square area	
E12 Retaining and managing industrial and urban services land	• Retain and manage industrial and urban services land, in line with the Principles for managing industrial and urban services land in the Eastern City District by safeguarding all industrial zoned land from conversion to residential development, including conversion to mixed use zones. In updating local environmental plans, councils are to conduct a strategic review of industrial land. • Facilitate the contemporary adaptation of industrial and warehouse buildings through increased floor to ceiling heights.	• As stated above the industrial use of the site will be maintained • Through increases height on the site it will facilitate the development of an innovative warehouses system that would be the first of its kind in Australia.
E13 Supporting growth of targeted industry sectors	• Consider the barriers to the growth of internationally competitive trade sectors, including engaging with industry and assessing regulatory barriers. • Provide a regulatory environment that enables economic opportunities created by changing technologies	• As above
Sustainability		
E15 -Protecting and enhancing bushland and biodiversity	• Requirements for protection and enhancement of biodiversity	• The site is a brownfield with limited existing vegetation. Opportunity to enhance through landscaped elements / open public accessible space.
E17 - Increasing urban tree canopy cover and delivering Green Grid connections	• Requirements to expand urban tree canopy and Green corridors and walking and cycling infrastructure	• Project to include cyclist / active transport facilities • Addition vegetation is included as part of the landscape design for the site.
E18 - Delivering high quality open space	• Encourages expansion of new open space	• A landscape design has been prepared to maintain and enhance open space on the site.
E19 – Reducing carbon emissions and managing energy, water and waste efficiently	• To encourage achievement of net zero emissions by 2050, use of high efficiency, low carbon design principles, precinct based renewable energy generation and waste reduction and recycling	• Project to take advantage of extensive roof area and implement on site energy generation through roof top PV to offset demand • In addition to above, deliver building “net zero carbon ready” though consideration of site fuel sourcing (e.g. avoidance of fossil fuels for heating and hot water generation –

Planning Priority	Action	Comment
		preference for heat pumps) and balance of electricity supplied from green power.
E20 – Adapting to the impacts of urban and natural hazards and climate change	• Support initiatives that respond to climate change, avoidance of locating new development in areas exposed to natural hazards and mitigation of urban heat island effect Stormwater management through WSUD and treatment before release from site to local waterways	• Climate risk assessment to be completed and risks designed out • External hardscape, landscape and building materials to have moderate to high SRI to reduce effects urban heat island.

4.1.3 City Employment Lands Strategy

The primary role of employment lands is to facilitate new business and industry opportunities, provide employment across a range of sectors, and provide land for strategic industrial activity and essential urban services. The employment lands play a crucial role in supporting growth of local, metropolitan, state and national economies whilst facilitating regional and global network connections. The site is located within the southern employment lands which contains the main corridor between the Sydney CBD, Sydney Airport and Port Botany.

The *City Employment Lands Strategy* seeks to support economic growth and increase connectivity.

The Planning Proposal is consistent with this strategy as the proposal aims to realise the strategic potential of the land to be more productive and sustainable.

4.1.4 Sustainable Sydney 2030

Sustainable Sydney 2030 is a plan to encourage the City of Sydney to become green, global and connected. The plan aims to:

- Increase the amount of green space available
- Encourage and foster global economic orientation, links and knowledge exchange
- Streamline the connectivity of the city through walking, cycling and public transport.

Sustainable Sydney 2030 is a plan to achieve the goals United Nations Sustainable Development Goals relevant to the City of Sydney and its community. It is a local action plan that aims to positively contribute to the sustainable development of the City of Sydney. The plan is also implemented by the Environmental Action 2016-2021 Strategy and Action Plan.

The Sydney 2030 strategy outlines ten targets for 2030 to make the city more sustainable. Table 4.2 outlines these targets and how that will be addressed as part of the development.

Table 4.2 Sustainable Sydney 2030 targets

Targets	Development implementation
70 per cent reduction in greenhouse gas emissions based on 2006 levels by 2030 and by 2050, achieve a net zero emissions city.	• Development to be low energy design by adopting passive and energy efficiency principles. • Deliver building “zero carbon ready” though consideration of site fuel sourcing (e.g. avoidance of fossil fuels for heating and hot water generation – preference for heat pumps) and balance of electricity supplied from green power

Targets	Development implementation
50 percent of electricity demand met by renewable sources; zero increase in potable water use from 2006 baseline, achieved through water efficiency and recycled water; total canopy cover increased by 50 per cent from 2008 baseline.	• Development to take advantage of extensive roof area and implement on site energy generation through roof top PV to offset demand. • Development to adopt water efficient design principles using high WELS rated fittings/fixtures in conjunction with on-site rainwater capture and re use for all non-potable water uses (toilets, wash down, landscaping). • Implement low water use landscaped elements.
There will be at least 138,000 dwellings in the city (including 48,000 additional dwellings compared to the 2006 baseline) for increased diversity of household types, including greater share of families.	N/A
7.5 per cent of all city housing will be social housing, and 7.5 per cent will be affordable housing, delivered by not-for-profit or other providers.	N/A
The city will contain at least 465,000 jobs (including 97,000 additional jobs) compared to the 2006 baseline) with an increased share in finance, advanced business services, education, creative industries and tourism sectors.	• Development will include the creation of a substantial amount of jobs during construction and operation, with a projected 370 jobs during operation. • Innovative design reduces the separation between industrial and other industry.
Trips to work using public transport will increase to 80 per cent, for both residents of the city and those travelling to the city from elsewhere.	• Development to include bike storage and end of trip facilities for staff. • Where possible staff will be encouraged to use public transport through as detailed in the Travel Plan.
Every resident will be within reasonable walking distance to most local services, including fresh food, childcare, health services and leisure, social, learning and cultural infrastructure.	N/A
Every resident will be within a 3-minute walk (250 m) of continuous green links that connect to the harbour foreshore, harbour parklands, Moore or Centennial or Sydney parks.	N/A
The level of community cohesion and social interaction will have increased based on at least 65 per cent of people believing most people can be trusted.	N/A

4.1.5 Environmental Action 2016-2021 Strategy and Action Plan

The *Environmental Action 2016-2021 Strategy and Action Plan* is a combination of a series of environmental master plans and strategies to guide the implementation of Sustainable Sydney 2030. The strategy details the delivery against environmental targets and the action plan communicates the method of improving operational and local area environmental performance from 2016 to 2021.

The strategy outlines areas of impacts and subsequent targets the City of Sydney aims to focus on. The aims are to become a city that is:

- Low-carbon
- Water sensitive
- Climate resilient
- Zero waste
- Active and connected
- Green and cool.

The document also includes a guide for excellence in new building design that nominates voluntary performance standards / targets across energy, emissions, water, materials and landscaping / biodiversity. To meet the targets set out for commercial buildings the development will:

- Consider targeting formal rating under Green Star (whole building) and apply NABERS Energy/Water rating principles to the development office components
- Meet the targets outlined in for carbon reduction, renewable energy, water and transport for Sustainable Sydney 2030
- Co or tri generation not recommended unless onsite renewable / low carbon form of energy can be derived from site or local waste source (e.g. waste wood, bio gas or similar)
- Development material selections:
  - Certified timber or recycled timber
  - Use of cement replacement materials and recycled aggregates
- To consider separating organic waste streams for composting for re use back on site in landscaping.

4.1.6 Future Transport Strategy 2056

Future Transport Strategy 2056 replaced the *NSW Long Term Masterplan 2014*. It sets the 40 year vision, directions and outcomes framework for customer mobility in NSW, which will guide transport investment over the longer term. It will be delivered through a series of supporting plans. An integrated network of corridors will support the efficient movement of people and goods throughout Greater Sydney. Future Transport 2056 is focused on three types of corridors that have been developed to align with the land use vision and to guide service levels (capacity, function and service frequencies) and infrastructure investment.

The hierarchy of corridors in Greater Sydney include

- City-shaping corridors – major trunk road and public transport corridors providing higher speed and volume connections between our cities and centres that shape locational decisions of residents and businesses
- City-serving corridors – higher density corridors within less than 10 kilometres of metropolitan centres providing high frequency access to metropolitan cities/centres with more frequent stopping patterns
- Centre-serving corridors – local corridors that support, buses, walking and cycling, to connect people with their nearest centre and transport interchange.

The strategy suggests that it is essential to encourage people to use active and public transport through the following methods:

- Expanding public transport networks
- Integrating waking and cycling network

A Preliminary Travel Plan has been developed for the proposed site by Ason Group to assist in removing barriers to active travel for all site employees and visitors and maximise the number of people who walk, cycle or utilise public or active transport to and from the site (refer to Appendix E). The Preliminary Travel Plan aligns with key principles outlined in the *Future Transport Strategy 2056*.

Relevant strategic directions that interact with the Planning Proposal include:

- Mobility as a services (MaaS) – encouraging a range of modes including “on demand”, “ride share”, “smart parking”, “Connected and Autonomous Vehicles” and “digital enablement”
- Use of drones for delivery of goods and emergency response transport
- Short trip (2 kilometres) mobility (e-bikes, motorised scooters)
- Accessible to mass transit and other forms of public transport
- Increasing modes of active travel (walking and cycling) through better connections
- Encouraging low emission forms of transport using alternative fuels
- Development to include end of trip facilities and bike parking / storage
- Parking for motorbikes / scooters
- Development to include parking spaces for ride share schemes
- Dedicated parking and infrastructure for low emission / alternative. Included EV charging
- Project to be designed to facilitate access and egress for autonomous vehicles
- Project to consider use of use of drones for movement of goods and enable for future drone staging area.

4.1.1 Greater Sydney Services and Infrastructure Plan

The *Greater Sydney Services and Infrastructure Plan* (Transport for NSW, 2018b) is a 40-year plan for transport in Sydney. It is designed to support the land use vision for Sydney. It builds on the state-wide transport outcomes identified in the Future Transport Strategy 2056, the Plan establishes the specific outcomes for transport customers in Greater Sydney and identifies the policy, service and infrastructure initiatives to achieve these.

This plan aims to develop a transport system that enables people and goods to move around the city efficiently. It aims to enable people within each city to access the nearest metropolitan and strategic centre within 30 minutes by public transport, 7 days a week using. This supports the growth of the region, sustaining and enhancing Sydney’s role as a global city and harnessing new technology for the benefit Sydney’s residents.

Developing land in this area aligns with the Greater Sydney Services and Infrastructure Plan as the proposal is on land recognised as having commercial hubs and future public and private transport infrastructure nearby. This supports the Greater Sydney Services and Infrastructure Plan objective of greater connectivity and growth in the region.

Table 4.3 details the key outcomes highlighted in the Future Transport Strategy 2056 and how they have been addressed as part of this Planning Proposal.

Table 4.3 Future Transport Strategy 2056 principle

Principle	Strategy	Comments
Customer Focused	New technology is harnessed to provide an integrated, end-to-end journey experience for customers	• Development to include end of trip facilities and bike parking / storage.
	Future forms of mobility are made available to customers and integrated with other modes of transport	• Development will link freight movements into the new WestConnex road network, which flanks the site along the north eastern and north western boundaries. • Development is designed to facilitate access and egress for autonomous vehicles.
Successful Places	Walking or cycling is the most convenient option for short trips around centres and local areas, supported by a safe road environment and suitable pathways	• Development includes end of trip facilities to encourage active transport to and from the site. • Preliminary travel plan outlines ways that the development can connect with existing public transport.
A Strong Economy	Efficient connectivity for freight measure by increased Volumes, cost and network efficiency	• The increased height on the site will result in an increased industrial distribution capacity • Proximity to CBD reduces cost of freight and impact on the road network.
Safety and Performance	Efficient, reliable and easy-to-understand journeys for customers, enabled by a simple hierarchy of services	• Design meets the *Sydney Development Control Plan 2012* (DCP) design requirements increasing safe of trucks entering and exiting the public road network.
	Efficient and reliable freight journeys supported by 24/7 rail access between key freight precincts with convenient access to centres	N/A
Accessible Services	Fully accessible transport for all customers	• Preliminary travel plan outlines ways that the development can connect with existing public transport.
Sustainability	Transport services and infrastructure are delivered, operated and maintained in a way that is affordable for customers and the community	• Parking for motorbikes / scooters • Development to include parking spaces for ride share schemes.
	A resilient transport system that contributes to the NSW Government's objective of net-zero emissions by 2050	• Dedicated parking and infrastructure for low emission / alternative. Included EV charging.

4.1.2 Better Placed

Better Placed (Government Architect of NSW, 2017a) is a policy outlining the needs and expectations in designing NSW. The policy is focused on enhancing all aspects of the urban environment, to create better places, spaces and buildings, and thereby better cities, towns and suburbs. The policy aims to provide a framework for examining places and reviewing proposals from a good design perspective and provide clear, consistent, rigorous objectives to achieve good design throughout the development process.

Through the provision of the above objectives, Better Placed plays a crucial role in maximising the benefits that can be gained when in the planning process of development. Objective 3 and 5 of this proposal outlines the need for having a 'Better for community' and 'Better working' approach. These objectives encourage the address of growing economic and social disparity by creating inclusive and connected environments, as well as designing buildings that are tailored to the environment they are located in to increase the functionality and fit of a building within an environment.

The planning proposal seeks to recognise the site's connection to nearby public transport and commercial hubs and the strategic potential of the site to be more productive, liveable and sustainable. Therefore, the planning proposal aligns with the policy.

A summary of the *Better Placed* principles that the proposal exhibits and how they are addressed as part of the design is detailed in Table 4.4.

Table 4.4 Better Placed design objectives

Design objective	Comment
Local – relates to the area or neighbourhood	• The design seeks to retain and reinforce valued qualities and distinctive characteristics of the area, by reinforcing street edges, retaining established trees where possible and relating to the historically significant Alexandra Canal. • The design provides a significant buffer from this new infrastructure to any properties located west of the site. The scale of the proposal is appropriate within the context of the surrounding WestConnex road network, which flanks the site along the north eastern and north western boundaries. • The spiral access ramps located at either end of the site are in keeping with the circular nature of the surrounding interchange.
Contextual – responds to the context and relates to the surrounds	• The proposal forms a significant landmark and gateway into an existing industrial precinct. The proposed design reflects high grade commercial and industrial standards and is responsive, sensitive and relevant to the local area, whilst conforming within the constraints of the project brief. • Whilst the proposal relates to the existing context, the design also acknowledges the significant environmental changes that are currently happening in the area, with two major infrastructure projects directly adjacent to the site, which dramatically alter the immediate context. • The warehouse walls have been designed to present a contemporary form where visible from public roads, reflecting its industrial function.
Sustainable – relates to the endurance of systems, buildings, spaces and processes – their ability to be maintained at a certain rate or level, which contributes positively to environmental, economic and social outcomes.	• Large roof area available for solar / photovoltaic provision. • Large roof catchment area for rainwater harvesting. • Minimum 6 m setback to site perimeter (up to 20 m in some areas) and space within spiral ramps provides deep soil area for new tree planting and vegetation. • The office façade includes a four-storey curtain wall providing the internal spaces with natural lighting, whilst meeting future Section J BCA requirements. Building form and orientation incorporates passive solar design principles including shading system proposed around

Design objective	Comment
	occupied / conditioned spaces to reduce heat loads and glare • Provision of end of trip facilities and gym encourages use of sustainable transport modes and provides health benefits for users.
Adaptable – able to adjust to new conditions, or to be modified for a new purpose.	The proposed building will consist of 3 levels of warehousing with a centralised hardstand and driveway, accessed via a one-way circular ramp system, at either end of the facility. Each floor layout has been designed to provide maximum flexibility allowing for a variety of warehouse sizes with efficient and segregated loading areas.
Durable – built to withstand wear and pressure.	The dual sided loading configuration in the warehouse maintains an unencumbered central access driveway throughout the building. The centralised nature of the hardstands also provides exceptional weather cover and forms an acoustic buffer for surrounding developments.
Inclusive – embraces the community and users.	Establishes a green edge along Burrows Road and Canal Road, providing continuity of landscaping and street trees, and linking to the new green spaces at either sides of the new flyovers.
Connected – establishes links with surrounds, allowing visitors and residents to move freely and sustainably.	• Significant improvement to the public realm along the entire site edge, creating a much more pedestrian friendly, accessible, and safe environment to both Burrows Road and Canal Road, which is also compatible with the new cycleway that is proposed along Canal Road, and along the Alexandra Canal. • Maximises the utilisation of a key site within an existing industrial area that is highly connected and will become an integral part of the supply chain. The project also provides significant employment opportunities and is easily accessible by public transport.
Diverse – embraces a richness in use, character and qualities.	• Embraces the existing and emerging diversity of the area by engaging with and helping to re-define and improve the existing road network and street edges, responds positively to the new St Peters Interchange, acting as a physical mediator between this new large scale infrastructure and the existing smaller scaled streets.
Safe – protects people from risk or harm	• The building is laid out in a logical way that provides maximum flexibility and adaptability for tenants, whilst maintaining almost complete segregation between heavy vehicle circulation and other building users, visitors and pedestrians, which creates a safe environment for users and the general public. • The number of access points for vehicles is minimised to reduce conflicts between vehicles and pedestrians using the footpath. • A minimum 6 m wide landscape setback has been provided along both the Canal and Burrows Road frontages. A deeper setback to the corner allows for more extensive landscaping and improves the sight lines for vehicles navigating the corner. • The design of the building and landscaping along Burrows Road and Canal Road creates an attractive public realm, provides significant benefits for the general public, and discourages antisocial behaviour.

Design objective	Comment
	Elsewhere, the design creates optimal conditions for inhabitants and supports a safe, comfortable and enjoyable experience
Comfortable – provides physical and emotional ease and well-being for users	• The commercial office complex located at the north-eastern end of the site, is away from the noisy roads at the opposite end of the site, and has been designed to offer all building occupants a flexible office environment with shared amenities including: common meeting rooms, end of trip facilities, a gymnasium and a café and balcony on the upper level.
Liveable – supports and responds to people's patterns of living	• The office façade design includes a four-storey glazed curtain wall screened with vertical aluminium blades for shading, permitting good levels of natural light all day long and providing views of the Alexandra Canal and towards the Sydney CBD from the upper levels.
Functional – designed to be practical and purposeful	• The design and arrangement of spaces supports working, relaxing and social interaction, and does not constrain these activities, as there is a clear distinction and definition between different functions. The warehousing areas are separated from working, social and leisure spaces by the circulation core. The gym is discreetly located and is adjacent to showers and car park. The café is located adjacent to the roof terrace. • The design supports both formalised activities, as well as informal or spontaneous ones. The layout and configuration of both the offices and the warehouses is structured and pragmatic, with the main circulation core located between these, giving users access to appropriate spaces as they need them. The location of the café is adjacent to the roof terrace spill out areas, which allows these spaces to be used in a more informal way.
Efficient – constructed and functions with minimal wasted effort	• The design encourages adaptability and flexibility and permits users and functional requirements to change over time, by providing a number of different warehouse sizes that cater to a variety of different users, rather than just catering to a single user type.
Fit for purpose – works according to its intended use	• The design supports the proposed use in an optimal and efficient manner which enables the required activities to be easily performed. The plan arrangement is based on a central vehicular circulation zone with warehouse units accessed on either side of this with vertical vehicle circulation at each end. This is a very efficient arrangement which minimises vehicle conflicts and also permits the building edges to be fenestrated.
Creating value – conceiving and designing in new opportunities to a building, place or space for increased social, economic and environmental benefits to the community	• The proposal maximises the site's ability to provide more job opportunities for the precinct whilst maximising the amount of businesses that can occupy the space.
Adding value – leveraging and building on the existing characteristics and qualities of a building place or space to increase social, economic and	• The proposal maintains the industrial functionality of the existing building and its surrounding context but enhances the quality of the industrial estate by providing a higher quality design which can potentially raise the standard for future industrial developments in the area.

Design objective	Comment
environmental benefits to the community	
Engaging – draws people in with features that generate interest	• The design provides a visually balanced form by using architectural elements that blend and enhance the architecture of the surrounding streetscape. Common industrial finishes such as the vertical ribbed colorbond cladding, off-form pre-cast concrete horizontal glazing, and aluminium louvres work together to provide a consistent architectural language with a balance of materials, finishes, proportions and details
Inviting – welcoming to visitors, community and individuals	• The 5 m high porte-cochere provides a definitive street address and adds a civic scale to this end of the building. The upper floor façade and roof overhang has been setback in order to reduce the visual scale of the office, and to provide a large outdoor area with extensive views of the city.
Attractive – aesthetically pleasing, appealing, inviting, engaging and attractive or more confronting visually will largely determine its value and usage by the community.	• The elevational treatment at each end of the building is different to the middle section, and creates a distinctive presence at these highly visible corners

4.1.3 Draft Greener Places

The draft *Greener Places* (Government Architect of NSW, 2017b) builds on the existing Sydney Green Grid. Greener Places is a draft Green Infrastructure policy produced by the Government Architect to guide the planning, design and deliver of Green Infrastructure in urban areas across NSW. The policy aims to create a healthier more liveable and sustainable urban environment.

Principle 1 of Greener Places is 'Integration', an aim for an increase in multi-purpose infrastructure through an integration of green and grey infrastructure. Combining green infrastructure in urban spaces can positively contribute to air and water quality, energy use and biodiversity.

The proposal aims to demonstrate the capacity of its urban design approach to protect for new trees, allow for the growth of new trees whilst ensuring for their long term health. This complies with the draft Greener Places policy and its goals to integrate green infrastructure with urban design.

4.1.4 Goodman's 2030 Sustainability Strategy

Goodman's 2030 Sustainability Strategy is structured around three pillars.

- Property
- People and culture
- Corporate performance.

These are linked to a set of material issues, with each pillar backed by short and long-term environmental, social and governance (ESG) targets. Progress reporting against these targets will occur annually. The key target of the Sustainability Strategy is for Goodman facilities to be Carbon Neutral and 100 percent renewable electricity by 2025.

5. Statutory planning provisions

5.1 State Environmental Planning Policies

5.1.1 State Environmental Planning Policy (State and Regional Development) 2011

State Environmental Planning Policy (State and Regional Development) 2011 (SRD SEPP) identifies development that is considered to be of state significance and includes provisions for State Significant Development (SSD) and State Significant Infrastructure (SSI).

Clause 12 of Schedule 1 of the SRD SEPP relates to warehouses or distribution centres and states that developments with a capital investment value of more than $50 million for a warehouse or distribution centre is considered SSD at one location and related to a single user. The proposal will have a capital investment value of over $100 million, however it would have multiple tenancies with differing operations, and therefore the current proposal is not SSD.

5.1.2 State Environmental Planning Policy (Infrastructure) 2007

State Environmental Planning Policy (Infrastructure) 2007 (Infrastructure SEPP) aims to facilitate the effective delivery of infrastructure across NSW and allows for a range of developments to be permitted with and without consent.

The Infrastructure SEPP also includes provisions for traffic generating development and requires referral and concurrence of Transport for NSW (formerly known as Roads and Maritime Services) for certain development which is expected to generate significant traffic. Schedule 3 of the Infrastructure SEPP identifies 'traffic generating development' which must be referred to the Roads and Maritime for concurrence. The schedule includes development for the purposes of warehouse or distribution centres with 8,000 square metres or more of GFA. The proposal will be considered a traffic generating development and concurrence from Transport for NSW will be required as part of the DA stage of the approvals process.

5.1.3 State Environmental Planning Policy 55 - Remediation of Land

State Environmental Planning Policy 55 - Remediation of Land (SEPP 55) provides for a State-wide planning approach to the remediation of contaminated land. In particular, the SEPP aims to promote the remediation of contaminated land for the purpose of reducing the risk of harm to human health or any other aspect of the environment.

The fill materials on-site have been identified to be contaminated with lead, benzo(a)pyrene, long chain-length total recoverable hydrocarbons (TRH) and asbestos (refer to Appendix L).

The contamination assessment concluded that the site is suitable for commercial/industrial land use under SEPP 55 provided that, there is implementation of control/management mechanisms and adherence to a Construction-phase Site Management Plan and a Long Term Site Management Plan. Further assessment would need to be undertaken during the DA stage.

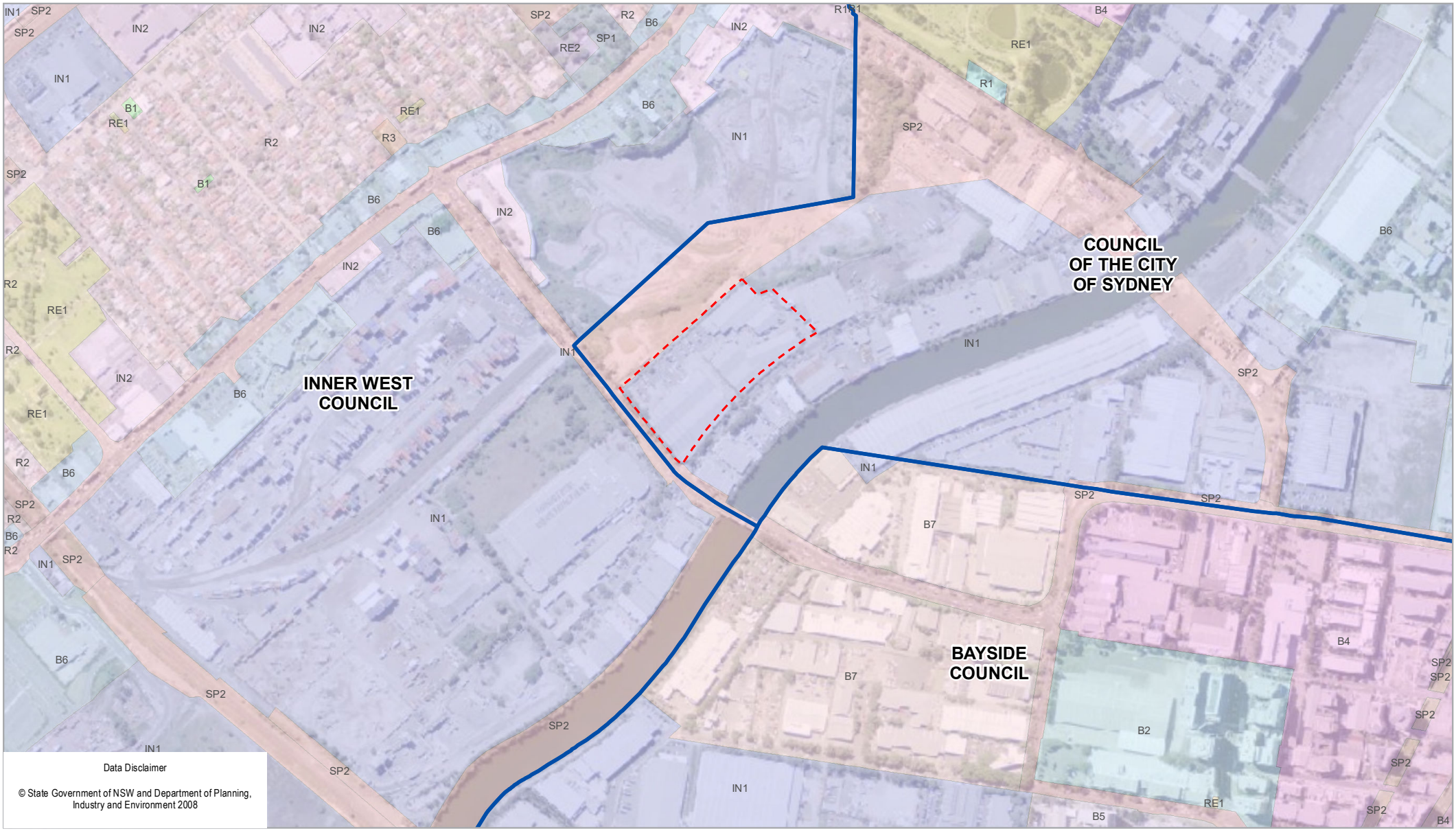
5.2 Current planning controls

5.2.1 Sydney Local Environmental Plan 2012

The Sydney LEP is the principal environmental planning instrument applying to the site. The provisions of the Sydney LEP and the key development controls are outlined below.

Zoning

The subject site is zoned IN1- General Industrial under the Sydney LEP (refer to Figure 5-1). Industrial uses are permitted with consent.



Legend

- 1-3 Burrows Road(The site)
- LGA Boundaries
- B1, Neighbourhood Centre
- B2, Local Centre
- B4, Mixed Use
- B5, Business Development
- B6, Enterprise Corridor
- B7, Business Park
- IN1, General Industrial
- IN2, Light Industrial
- R1, General Residential
- R2, Low Density Residential
- R3, Medium Density Residential
- RE1, Public Recreation
- RE2, Private Recreation
- SP1, Special Activities
- SP2, Infrastructure

Paper Size ISO A4

0 50 100 150 200

Meters

Map Projection: Transverse Mercator
Horizontal Datum: GDA 1994
Grid: GDA 1994 MGA Zone 56

N

GHD

Goodman
Planning Proposal Justification Report
1-3 Burrows Road, St Peters

Site zoning

Project No. **12521130**
Revision No. **Final**
Date **25/ 02/ 2020**

FIGURE 6-1

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Print date: 25 Feb 2020 - 16:40

Data source: Sources: Esri, HERE, Garmin, Intermap, increment P Corp., GEBCO, USGS, FAO, NPS, NRCAN, GeoBase, IGN, Kadaster NL, Ordnance Survey, Esri Japan, METI, Esri China (Hong Kong), (c) OpenStreetMap contributors, and the GIS User Community. Created by: lmanasan

Applicable planning provisions

The existing Sydney LEP provisions that apply to the site are listed in Table 5.1.

Table 5.1 Sydney Local Environmental Plan 2012

Clause	LEP development control	Consistency/ discussion
4.3 Height of buildings		
4.3(2)	The height of a building on any land is not to exceed the maximum height shown for the land on the Height of Buildings Map.	Maximum building height: 18 m. This Planning Proposal outlines the justification to increase the maximum building height limit of the site to 30 m (refer to Figure 3-1).
4.4. Floor space ratio		
4.4(2)	The maximum floor space ratio for a building on any land is not to exceed the floor space ratio shown for the land on the Floor Space Ratio Map.	Maximum floor space ratio: 1.5:1. The proposal is compliant with this planning control.
4.6 Exceptions to development standards		
4.6(8)	This clause does not allow development consent to be granted for development that would contravene any of the following— (a) a development standard for complying development, (b) a development standard that arises, under the regulations under the Act, in connection with a commitment set out in a BASIX certificate for a building to which State Environmental Planning Policy (Building Sustainability Index: BASIX) 2004 applies or for the land on which such a building is situated, (c) clause 5.4, … (ce) clause 6.17 (Sun access planes), (ch) Division 1 of Part 7 (Car parking ancillary to other development).	The proposal is compliant with this planning control. Further assessment will be undertaken as part of the Development Application (DA) stage.
5.4 Controls relating to miscellaneous permissible uses		
5.4(4)	Industrial retail outlets If development for the purposes of an industrial retail outlet is permitted under this Plan, the retail floor area must not exceed— (a) 20% of the gross floor area of the industry or rural industry located on the same land as the retail outlet, or (b) 400 square metres, whichever is the lesser.	There is no industrial retail outlet proposed as part of the current design.

Clause	LEP development control	Consistency/ discussion
6.17 Sun access planes		
6.17(2)	The consent authority must not grant development consent to development on land if the development will result in any building on the land projecting higher than any part of a sun access plane taken to extend over the land under this clause.	Assessment of impacts to the sun access plan will be taken into consideration as part of the DA. The site is located to the immediate east of WestConnex and is separated from other built forms by Burrows Road (20 m) and Canal Road (30 m). It is not expected that the increased height will result in the building projecting higher than any part of a sun access plane taken to extend over the land.
6.17(3)	Each of subclauses (5)–(19) describes a different sun access plane that is taken to extend over land. The front of each plane is a line between two specified points (X and Y) and the sides of the plane extend back from those points along a specified horizontal bearing (B) and vertical angle (V).	As above.
7.2 Interpretation		
7.2(3)	For the purposes of this Division, land is in Category D, Category E or Category F if it is shown on the Public Transport Accessibility Level Map as being in one of those categories. However, land is taken to be in another of those categories if— (a) the land is part of a site that includes land in that other category, and (b) this Division would permit a greater number of car parking spaces if the land were in that other category.	The site is located in Category F with limited access to public transport.
7.3 Car parking spaces not to exceed maximum set out in this Division		
7.3(1)	Development consent must not be granted to development that includes car parking spaces in connection with a proposed use of land if the total number of car parking spaces (including existing car parking spaces) provided on the site would be greater than the maximum set out in this Division.	As set out in this Division maximum number of car parking spaces for the proposed building is 328. The design for the site proposes 311 car parking spaces on site, subject to DA refinement. This is 17 car parking spaces below the maximum amount set out as part in this Division.
7.3(2)	If the maximum number of car parking spaces under this Division is not a whole number, the number is to be rounded to the nearest whole number.	Noted
7.6 Office Premises and business premises		
7.6	The maximum number of car parking spaces for a building used for the purposes of office premises or business premises is as follows— … (c) if the building is on land in category F and has a floor space ratio of no more than 1.5:1—1 space for each 75 square metres of gross floor area of the building used for those purposes,	1 space for every 70 m^2 of GFA.

Clause	LEP development control	Consistency/ discussion
7.8 Industry and warehouse or distribution centres		
7.8 (1)	The maximum number of car parking spaces for a building used for the purposes of industry is as follows— …. (c) if the building is on land in category F—1 space for each 100 square metres of gross floor area of the building used for those purposes.	1 space for every 100 m^2 of GFA
7.8 (2)	The maximum number of car parking spaces for a building used for the purposes of warehouse or distribution centres is as follows— … (c) if the building is on land in category F—1 space for each 300 square metres of gross floor area of the building used for those purposes.	1 space for every 300 m^2 of GFA
7.14 Acid Sulfate Soils		
7.14 (2)	Development consent is required for the carrying out of works described in the Table to this subclause on land shown on the Acid Sulfate Soils Map as being of the class specified for those works. Class of land… Class 3 Works more than 1 metre below the natural ground surface. Works by which the watertable is likely to be lowered more than 1 metre below the natural ground surface.	Site is mapped as Class 3 ASS.
7.14 (3)	Development consent must not be granted under this clause for the carrying out of works unless an acid sulfate soils management plan has been prepared for the proposed works in accordance with the Acid Sulfate Soils Manual and has been provided to the consent authority.	As part of the DA an Acid Sulfate Soils management plan will be prepared

Clause	LEP development control	Consistency/ discussion
7.15 Flood planning		
7.15 (3)	Development consent must not be granted to development on land to which this clause applies unless the consent authority is satisfied that the development— (a) is compatible with the flood hazard of the land, and (b) is not likely to significantly adversely affect flood behaviour resulting in detrimental increases in the potential flood affectation of other development or properties, and (c) incorporates appropriate measures to manage risk to life from flood, and (d) is not likely to significantly adversely affect the environment or cause avoidable erosion, siltation, destruction of riparian vegetation or a reduction in the stability of river banks or watercourses, and (e) is not likely to result in unsustainable social and economic costs to the community as a consequence of flooding.	The site is located within the Alexandra Canal Flood Plan Risk assessment area. The site is located within a high risk Probable Maximum flood area and a high risk 1 in 100 year ARI. The site has been elevated to ensure the level of the underground car park is above the 1 in 100 year ARI event.
7.15 (5)	In this clause— flood planning level means the level of a 1:100 ARI (average recurrent interval) flood event plus 0.5 metres freeboard.	Flood planning level at lowest point on site is 1.5 m
7.16 Airspace operations		
7.16 (3)	The consent authority may grant development consent for the development, if the relevant Commonwealth body advises that— (a) the development will penetrate the Limitation or Operations Surface but it has no objection to its construction, or (b) the development will not penetrate the Limitation or Operations Surface.	Under the Commonwealth Department of Infrastructure and Regional Development's *Prescribe Airspace for Sydney Airport Obstacle Limitation Surface* map the site is located in an the *Inner Horizontal surface 51 m AHD.* The proposed increase in the height of the building will not penetrate the Limitation or Operations Surface.
7.17 Development in areas subject to aircraft noise		
(3)	Before determining a development application for development to which this clause applies, the consent authority— (a) must consider whether the development will result in an increase in the number of dwellings or people affected by aircraft noise, and (b) must consider the location of the development in relation to the criteria set out in Table 2.1 (Building Site Acceptability Based on ANEF Zones) in AS 2021—2000, and (c) must be satisfied the development will meet the indoor design sound levels shown in Table 3.3 (Indoor Design Sound Levels for Determination of Aircraft Noise Reduction) in AS 2021—2000.	The site is located in an area mapped as an ANEF Zone and is within the 25 ANEF Contour. As part of the DA, Table 3.3 (Indoor Design Sound Levels for Determination of Aircraft Noise Reduction) and Table 2.1 (Building Site Acceptability Based on ANEF Zones) in AS 2021—2000 will be assessed.

Clause	LEP development control	Consistency/ discussion
7.25 Sustainable transport on southern employment land		
(2)	Development consent must not be granted to development to which this clause applies unless the consent authority is satisfied that the development will promote sustainable transport modes and minimise traffic congestion.	As the development will be a new building in on southern employment land, the site must promote sustainable transport modes and minimise traffic congestion. The Preliminary travel plan addresses how sustainable forms of transport can be promoted at the site.

5.2.2 Sydney Development Control Plan 2012

Applicable controls from the Sydney DCP 2012 are listed in Table 5.2.

Table 5.2 Sydney Development Control Plan 2012

Clause	DCP controls	Consistency/ discussion
3.1.2 Pedestrian and bike network		
(1)	Through-site links are to be provided in the locations shown on the *Through-site links map*.	Currently no through-site link is proposed.
(2)	Through-site links are to be provided on sites: (a) greater than 5,000 sqm in area; (b) with parallel street frontages greater than 100m apart, and (c) where the consent authority considers one is needed or desirable.	Addressed in Appendix A. Further details will be provided at the DA stage.
(4)	(a) generally have a minimum width of 4m, or 6m where bike access is provided, and have a clear height of at least 6m; (b) be direct and accessible to all, have a clear line of sight between public places and be open to the sky as much as is practicable; (c) align with breaks between buildings so that views are extended and there is less sense of enclosure; (d) be easily identified by users and include signage advising of the publicly accessible status of the link and the places to which it connects; (e) be clearly distinguished from vehicle accessways, unless they are purposely designed as shareways; (f) include materials and finishes such as paving materials, tree planting and furniture consistent with adjoining streets and public spaces and be graffiti and vandalism resistant; (g) be clear of obstructions or structures, such as electricity substations, or car park exhaust vents; (h) include landscaping to assist in guiding people along the link while enabling long sightlines; and (i) be fully accessible 24 hours a day.	Addressed in Appendix A and Appendix D. Further details will be provided at the DA stage.
3.1.5 Public art		
(1)	Integrate public art in essential ecological sustainable infrastructure.	Addressed in Appendix H
(2)	A detailed Public Art Strategy is to be submitted with a site specific DCP or a Stage 1 DA (refer to clause 7.22 of the Sydney LEP),	Addressed in Appendix H

Clause	DCP controls	Consistency/ discussion
(3)	Public Art is to be provided in accordance with the *City of Sydney Guidelines for Public Art in Private Development* and the *Public Art Policy* (available at www.cityofsydney.nsw.gov.au).	Addressed in Appendix H
3.1.6 Sites greater than 5,000sqm		
(1)	New streets, lanes and footpaths are to be designed in accordance with the provisions within Section 3.1 Public Domain Elements.	Refer to Appendix A
(2)	Introduce through-site links, narrow building frontages and limiting the length and size of street blocks.	Refer to Appendix A
(3)	Street blocks are not to exceed 120m in length. Where site frontages exceed 120m, new public streets are to be introduced.	Refer to Appendix A
(4)	New streets are to be located to align and connect with the surrounding street network, maximising connectivity and creating view corridors.	Refer to Appendix A
(5)	Lanes, shared ways or through-site links are to be provided at breaks between buildings.	N/A. Only one building proposed
(6)	The layout of the development is to provide legible and publicly accessible through-site links.	*N/A*
(9)	A Public Art Strategy is to be submitted with a Site Specific DCP or Stage1 DA and is to describe the public art proposed for the development and be consistent with the City of Sydney Guidelines for Public Art in Private Development.	Addressed in Appendix H
3.2.2 Addressing the street and the public domain		
(1)	Buildings are to be designed to positively address the street.	As shown in Appendix A and detailed in the Appendix B
(2)	Buildings are to be designed to maximise the number of entries, visible internal uses at ground level, and include high quality finishes and public art to enhance the public domain.	As detailed in the Appendix A and Appendix H the proposal will enhance the public domain.
(4)	Ground floor tenancies and building entry lobbies on sites not flood affected are to: (a) have entries at the same level as the adjacent footpath or public domain; (b) have finished floor levels between 0-1.0m above or below the adjacent footpath or public domain entry; (c) provide opportunities for direct surveillance of the adjacent street or public domain at maximum intervals of 6m	Refer to Appendix A
(5)	Car parking areas at ground level are to be screened by active uses to a minimum depth of 6m from the facade visible to the street or public domain.	Refer to Appendix A

Clause	DCP controls	Consistency/ discussion
(6)	Basement parking areas and structures: (a) in Central Sydney, must not protrude above the level of the adjacent street or public domain; (b) in other areas, must not protrude more than 1.0m above the level of the adjacent street or public domain. Where they are visible, basement structures and vent grills are to be integrated into the building and landscape design. Ventilation grills are to block views into basement areas and, in appropriate locations, be screened by landscaping in garden beds with a minimum soil plan depth of 1m.	Refer to Appendix A
(9)	Align breaks between buildings with nearby streets, lanes and pedestrian links to enable view connections.	Refer to Appendix A
3.6.1 Energy efficiency in non residential developments		
(1)	Development is to be designed and constructed to reduce the need for active heating and cooling by incorporating passive design measures including design, location and thermal properties of glazing, natural ventilation, appropriate use of thermal mass and external shading, including vegetation.	Addressed in Appendix C
(2)	Generally, rainwater tanks are to be installed for all non-residential developments, including major alterations and additions that have access to a roof form from which rainwater can be feasibly collected and plumbed to appropriate end uses.	Addressed in Appendix C
(3)	Where a non-residential building, the public domain, a public or private open space or a community facility is serviced by a dual reticulation system for permitted non-potable uses such as toilet flushing, irrigation, car washing, fire fighting and certain industrial purposes, the development is to be connected to the system.	Addressed in Appendix C and Appendix M
(4)	Generally, water used for irrigation of public and private open space is to be drawn from reclaimed water or harvested rainwater sources. Possible sources include harvested stormwater, treated greywater and wastewater and water from a decentralised local network.	Addressed in Appendix C
(5)	Separate meters are to be installed for each individual tenancy in commercial or retail buildings over 5,000sqm, such as separate tenant areas within a shopping centre.	Addressed in Appendix C
3.6.5 Materials and building components		
(1)	Paints and floor coverings with low levels of volatile organic compounds (VOC) and low formaldehyde wood products are to be used where possible.	Addressed in Appendix A and Appendix F
(2)	Where possible, use building materials, fittings and finishes that: (a) have been recycled; (b) are made from or incorporate recycled materials; and (c) have been certified as sustainable or 'environmentally friendly' by a recognised third party certification scheme.	Addressed in Appendix B and Appendix C
(3)	Design building components, including the structural framing, roofing and facade cladding for longevity, adaptation, disassembly, re-use and recycling.	Addressed in Appendix B and Appendix F

Clause	DCP controls	Consistency/ discussion
(4)	Reduce the amount of materials used in the construction of a building wherever possible. Examples of potential methods include: (a) exposing structures to reduce the use of floor, ceiling and wall cladding and finishes; (b) naturally ventilating buildings to reduce ductwork; (c) providing waterless urinals to reduce piping and water use; (d) using prefabricated components for internal fit outs; and (e) providing only one bathroom for every two bedrooms in residential developments.	Addressed in Appendix B and Appendix F
3.7.1 Site specific flood study		
(1)	When required by Clause 7.15 of Sydney LEP, a site-specific flood study is to be prepared by a suitably qualified and experienced hydrologist in accordance with the NSW Floodplain Development Manual 2005, the NSW Coastal Planning Guideline: Adapting to Sea Level Rise, NSW Coastal Risk Management Guide: Incorporating Sea Level Rise Benchmarks In Coastal Risk Assessments and the NSW Flood Risk Management Guide: Incorporating Sea Level Rise Benchmarks In Flood Risk Assessments.	Addressed in Appendix I. Further assessment will be undertaken as part of the DA stage.
(2	The site-specific flood study is to include, but not be limited to: (a) a detailed topographical survey that defines flow paths, storage areas and hydraulic controls; and (b) flood modelling that uses appropriate hydrological and hydraulic techniques and incorporates boundary conditions.	Addressed in Appendix I. Further assessment will be undertaken as part of the DA stage.
(3)	The site-specific flood study is to show pre-development and post-development scenarios, and at a minimum is to include the following information: (a) water surface contours; (b) velocity vectors; (c) velocity and depth product contours; (d) delineation of flood risk precincts; and (e) flood profiles for the full range of events for total development including all structures and works (such as revegetation and physical enhancements).	Addressed in Appendix I. Further assessment will be undertaken as part of the DA stage.
(4)	The site-specific flood study is to assume the 'worst case scenario' conditions for blockages to pipes, culverts and other infrastructure, such that: (a) kerb inlets are assumed to be 50% blocked; (b) sag pits are assumed to be 100% blocked; and (c) culverts and bridges with an open area less than six metres, measured on the diagonal, are assumed to be 50% blocked.	Addressed in Appendix I. Further assessment will be undertaken as part of the DA stage.
3.7.5 Water re-use, recycling and harvesting		
(1)	Development proposals that seek to re-use water runoff from paved surfaces for irrigation and wash down purposes are to incorporate measures into the design of the development that will treat the water to ensure that it is fit for this purpose. These measures are to clean the water to exclude contaminants such as litter, sediment and oil.	Addressed in the Appendix C

Clause	DCP controls	Consistency/ discussion
3.11.1 Managing transport demand		
(1)	A Transport Impact Study is required to address the potential impact of the development on surrounding movement systems where the proposal is: (a) a non-residential development equal to or greater than 1,000sqm GFA; (b) car park with more than 200 spaces; (c) for 25 or more dwellings; or (d) in the opinion of the consent authority, likely to generate significant traffic impacts.	Addressed in the Appendix K and Appendix L
(2)	Commercial development is to include initiatives to promote walking, cycling and the use of public transport, through the submission of a Green Travel Plan, where the estimated peak trip generation is greater than or equal to: (a) 100 vehicles per hour for non-residential development; or (b) 50 vehicles per hour for residential development within Green Square and shown as Category A on the *Land Use and Transport Integration Map*; or (c) 60 vehicles per hour for residential development within Green Square and shown as Category B or C on the *Land Use and Transport Integration Map*; or (d) is likely to generate significant traffic impacts according to Council.	Addressed in the Appendix E and Appendix L
(3)	A Transport Access Guide and a strategy for the future availability of the Guide to residents, employees and visitors of a development is to be prepared for all developments except: (a) individual dwelling houses and dual occupancies; (b) residential flat buildings of less than 25 units; (c) individual businesses and services in existing shopping strips and retail centres; (d) developments having a floor area of less than 1,000sqm GFA; and (e) businesses employing less than 10 staff.	Addressed in Appendix E
3.11.3 Bike parking and associated facilities		
(1)	All development is to provide on-site bike parking designed in accordance with the relevant Australian Standards for the design criteria of bike parking facilities.	Refer to Appendix A, and Appendix E
(2)	Bike parking spaces for new developments are to be provided in accordance with the rates set out in Table 3.5 On-site bike parking rates, except where: (b) a proposed use is not included in Table 3.5 On-site bike parking rates, an applicant is to provide bike facilities to accommodate Council's mode share target for trips by bike as described in the *Cycle Strategy and Action Plan 2007-2017*.	Refer to Appendix A, Appendix D and Appendix E
(3)	Secure bike parking facilities are to be provided in accordance with the following: (a) Class 1 bike lockers for occupants of residential buildings; (b) Class 2 bike facilities for staff/employees of any land use; and (c) Class 3 bike rails for visitors of any land use.	Refer to Appendix A, Appendix D and Appendix E

Clause	DCP controls	Consistency/ discussion
(4)	Where bike parking for tenants is provided in a basement, it is to be located: (a) on the uppermost level of the basement; (b) close to entry/exit points; and (c) subject	Refer to Appendix A, Appendix D and Appendix E
(5)	A safe path of travel from bike parking areas to entry/exit points is to be marked.	Refer to Appendix A, Appendix D and Appendix E
(6)	Access to bike parking areas are to be: (a) a minimum of 1.8m wide to allow a pedestrian and a person on a bike to pass each other and may be shared with vehicles within buildings and at entries to buildings); (b) accessible via a ramp; (c) clearly identified by signage; and (d) accessible via appropriate security or intercom systems.	Refer to Appendix A, Appendix D and Appendix E
(7)	Bike parking for visitors is to be provided in an accessible on-grade location near a major public entrance to the development and is to be signposted.	Refer to Appendix A, Appendix D and Appendix E
(8)	For non-residential uses, the following facilities for bike parking are to be provided at the following rates: (a) 1 personal locker for each bike parking space; (b) 1 shower and change cubicle for up to 10 bike parking spaces; (c) 2 shower and change cubicles for 11 to 20 or more bike parking spaces are provided; (d) 2 additional showers and cubicles for each additional 20 bike parking spaces or part thereof; (e) showers and change facilities may be provided in the form of shower and change cubicles in a unisex area in both female and male change rooms; and (f) locker, change room and shower facilities are to be located close to the bike parking area, entry and exit points and within an area of security camera surveillance where there are such building security systems.	Refer to Appendix A, Appendix D and Appendix E
3.11.4 Vehicle parking		
(1)	Where the development comprises a land use not specified in the Sydney LEP, the proposed rate of car parking provision is to be justified via a Parking and Access Report.	Refer to Appendix A and Appendix D
(3)	All visitor spaces are to be grouped together in the most convenient locations relative to car parking area entrances, pedestrian lifts and access points and are to be separately marked and clearly sign-posted.	Refer to Appendix A and Appendix D
(4)	Development applications are to indicate how visitor parking is to be accessed, including arrangements for access into a secure area if proposed.	Refer to Appendix A and Appendix D
(5)	New developments are to achieve high quality ground level relationships between the buildings and all public domain interfaces even where this will result in inefficient basement car parking layouts including: spilt basement levels or additional excavation.	Refer to Appendix A and Appendix D

Clause	DCP controls	Consistency/ discussion
3.11.7 Motorbike parking		
(1)	Parking spaces for motorbikes are to be included in the allocation of car parking and provided according to parking rates in Schedule 7 Transport, parking and access. Schedule 7: 1 space per 12 staff	Refer to Appendix A and Appendix D
(5)	Access for pedestrians and vehicles are to be separated.	Refer to Appendix A and Appendix D
(6)	Access arrangements are to be: (a) integral with the overall building and landscape design and not appear as 'add-on' elements or as of secondary importance; (b) as direct as possible; and (c) designed so that a person does not need to summon help.	Refer to Appendix A and Appendix D
3.11.9 Accessible parking		
(1)	Accessible car parking spaces for people with a mobility impairment are to be included in the allocation of car parking for a development and provided in accordance with the rates specified in Schedule 7 Transport, parking and access.	Refer to Appendix A and Appendix D
3.*11.10 Vehicle access for developments greater than 1000sqm GFA*		
(1)	For developments equal to or greater than 1,000sqm GFA, vehicle access to a site is to be located so the safety of those using the access and the street is not likely to be compromised. Vehicle access is not to be located in the following locations:	Refer to Appendix A and Appendix D
(2)	(a)within 10m of an uncontrolled intersection, including intersections with laneways; (b) within 25m of the property boundary adjacent to a signalised intersection; (c) within 60m of the approach side of an intersection on a state road and within 30m on its departure side; (d) within 12m of a 'stop' or 'give way' sign or hold line at intersections; (e) opposite a busy side road for a distance of 6m beyond the alignment of the property boundaries adjacent to that side road; (f) opposite a busy driveway for a distance of 6m beyond the alignment of the driveway edges; (g) within 15m of the alignment of an intersection where the proposed vehicle access is to be used by service vehicles; (h) within 30m of the alignment of an intersection where the proposed vehicle access is used by service vehicles to access 3 or more loading spaces; (i) where there is insufficient 'weaving' distance to or from a nearby road that could be used by traffic generated by the development; (j) within 2m of other access driveways or within 1m of any common boundary, except where access is off a laneway; and (k) within 20m of the approach to, and 10m of the departure from an existing or proposed pedestrian crossing.	Refer to Appendix A and Appendix D

Clause	DCP controls	Consistency/ discussion
3.11.11 Vehicle access and footpaths		
(3)	Car parks are to be designed so that vehicles do not queue or reverse across pedestrian crossings or footpaths.	Refer to Appendix A and Appendix D
(4)	Parking and driveway crossovers are to be designed to minimise impact on existing street trees and to maximise opportunities for new street tree plantings.	Refer to Appendix A and Appendix D
(5)	Walking routes through car parks with more than 150 car spaces are to be clearly delineated with appropriate markings, pedestrian crossings and signposting.	Refer to Appendix A and Appendix D
(6)	Vehicular access is to be designed to give priority to pedestrians and cyclists by continuing the type of footpath material and grade.	Refer to Appendix A and Appendix D
(7)	Wherever practicable, vehicle access and egress is to be a single crossing with a maximum width of 3.6m over the footpath, and perpendicular to the kerb alignment as shown in Figure 3.21 *Vehicle crossing layout*.	Refer to Appendix A and Appendix D
(8)	Subject to urban design, heritage and streetscape considerations, access is to be designed to avoid reversing movements into or out of a public street for all developments other than dwelling houses. If necessary, a mechanical turntable may need to be installed to achieve this requirement.	Refer to Appendix A and Appendix D
(9)	On-site parking may be refused where the required access arrangements would have an adverse impact on on-street parking.	Refer to Appendix A and Appendix D
(10)	Where possible adjoining developments are to share or amalgamate vehicle entry and exit points. Internal on-site signal equipment is to be used to allow shared access.	Refer to Appendix A and Appendix D
(11)	Direct access to a designated arterial or sub-arterial road is not permitted wherever an alternate access can be provided.	Refer to Appendix A and Appendix D
(12)	Where rear lane access is achievable, car parking is to be designed to be accessed from the rear lane only.	Refer to Appendix A and Appendix D
(13)	Where vehicular access to parking is not accessed from the laneway it is to be located on a secondary street.	Refer to Appendix A and Appendix D
(14)	Where there is no parking on an original lot and off-street parking is not characteristic, vehicle access from the street is not allowed.	Refer to Appendix A and Appendix D
(15)	Service vehicle access is to be combined with parking access and provided in accordance with other controls for vehicular access in this DCP	Refer to Appendix A and Appendix D
3.12.1 Accessible design general		
(1)	All development must comply with the following: all Australian Standards relevant to accessibility; the Building Code of Australia access requirements; and *Disability Discrimination Act 1992*. Complex developments where compliance is proposed through alternative solutions must be accompanied by an Access report prepared by a suitably qualified access professional.	Further assessment will be undertaken as part of the DA stage.
(5)	Access for pedestrians and vehicles are to be separated.	Refer to Appendix A

Clause	DCP controls	Consistency/ discussion
3.13.1 Crime prevention through environmental design		
(2)	In commercial, retail or public buildings, facilities such as toilets and parents rooms are to be conveniently located and designed to maximise casual surveillance to facility entries.	Refer to Appendix A
(3)	Minimise blind-corners, recesses and other external areas that have the potential for concealment or entrapment.	Refer to Appendix A
(4)	Building entries are to be clearly visible, unobstructed and easily identifiable from the street, other public areas and other development. Where practicable lift lobbies, stairwells, hallways and corridors should be visible from the public domain.	Refer to Appendix A
(5)	Ground floors of non-residential buildings, the non-residential component of mixed use developments, and the foyers of residential buildings, are to be designed to enable surveillance from the public domain to the inside of the building at night.	Refer to Appendix A
(6)	Pedestrian routes from car parking spaces to lift lobbies are to be as direct as possible with clear lines of sight along the route.	Refer to Appendix A
(8)	Building details such as fencing, drainpipes and landscaping are to be designed so that illegitimate access is not facilitated by the opportunity for foot or hand-holds, concealment and the like.	Refer to Appendix A
(2)	Waste incineration devices are not permitted.	Refer to Appendix A
3.17 Contamination		
(1)	Each development application is to include information sufficient to allow Council to meet its obligation to determine whether development should be restricted due to the presence of contamination.	Refer to Appendix L

6. Environmental assessment

6.1 Building height assessment

This planning proposal seeks to change the maximum building height allowance from 18 metres to 30 metres under the Sydney LEP. This will facilitate the redevelopment of the site into a multi-storey industrial and warehousing building.

An overview of the potential impacts of the proposed height increase is outlined in the sections below. Further information is provided in the urban design analysis which is provided in Appendix B.

6.1.1 Elevation analysis

The site is unique in that the new St Peters Interchange that borders the site on two sides contributes to a dramatic change in the urban context from the current situation. Some of the new road structures are up to 22 metres high. The proposal at 1-3 Burrows Road will need to respond to these significant new structures, which justifies an increased height as the current 18 metre height limit is based on the existing context which features significantly lower heights for nearby structures.

Massing sketches showing the future streetscape elevations were prepared as part of the urban design report. These are shown in Figure 6-1.

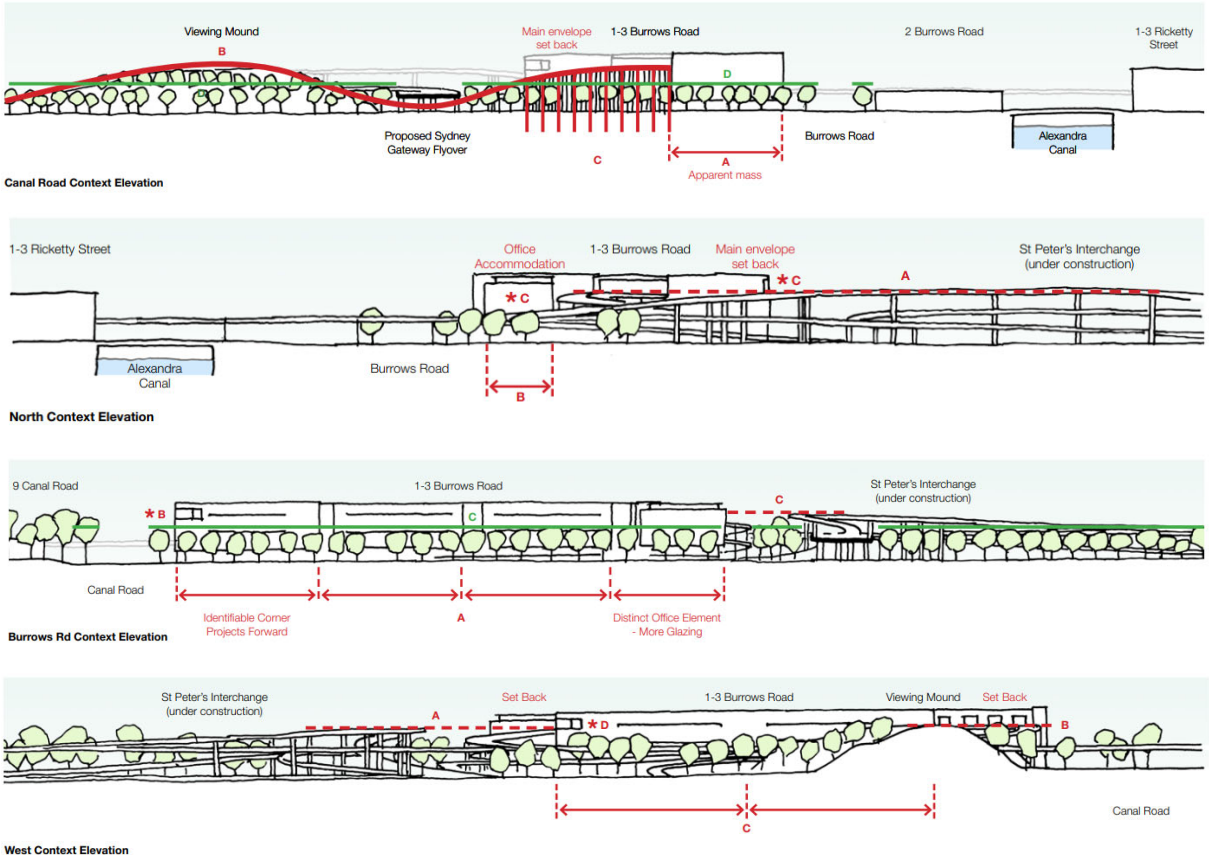


Figure 6-1 Massing sketches of the proposal

The mass analysis demonstrated that the mass of the proposal is consistent with the under construction and future surrounding context, with elements of the proposed mass having similar height relationships to proposed new road structures, in particular the proposed flyovers over

both Canal Road and Burrows Road as these new structures are / will be directly adjacent to the proposal.

In addition, the Canal and Burrows Road facades are articulated for visual interest and to break up the appearance of height, bulk and scale. Articulation is enhanced by incorporating setbacks (between 6 and 20 metres) along the building frontages. The proposed articulation minimises the feeling of enclosure at street level.

Canal Road

The mass of the main three storey element of the building on Canal Road is broken down as more than 50 percent of the main building envelope is set back from the street edge here. The spiral ramp is a full storey lower in this location and is analogous to the curvature of the viewing mound in form and its height relationship.

Burrows Road

The height of the proposal is in keeping with the height of St Peters Interchange and provides an adequately scaled elevation along the length of Burrows Road which acts as a buffer between the public realm and this new significant infrastructure.

Retention of viable street trees, along with the provision of new street trees helps to maintain the continuity of the tree lined street edge along Burrows Road and provide screening and softening to the building elevation.

The bulk and length of the building is broken down through articulation of its distinct parts, which reflects the function in a particular location. This is achieved through the material changes and setbacks along the length of the facade. Vertically the building has a clear, base, middle and top, with individual floor levels identifiable through the location of the horizontal bands of windows.

6.1.2 Overshadowing

The building's orientation and the site's position means overshadowing impacts are minimised as shadows will be cast towards roads rather than upon adjacent sites. Also, there are no sensitive uses within close proximity of the site given the industrial zoning.

Burrows Road is one street back from the canal and therefore an increase in height would not cause overshadowing or negative visual impacts on the canal.

A key views analysis is provided in Section 6.2, the analysis demonstrates that the proposed height increase would not negatively impact viewpoints or along the canal towards the city.

Future stages of the project will be guided by the urban design principles established for the project and by a number of strategies and plans which are described in Chapter 3 .

6.2 Visual assessment

This section provides an overview of the visual assessment undertaken as part of the Urban Design Report (Appendix B).

The assessment included a review of the proposal from six different viewpoints. The selected viewpoints are shown in Figure 6-2.

Figure 6-2 Key viewpoints

A visual analysis of the selected views is provided in the sections below.

6.2.1 View 1 – Canal Road towards the city

Views towards the existing site and proposed site from Canal Road Bridge are shown in Figure 6-3.

View 1 Existing - View from Canal Road bridge, looking North towards the city

View 1 Proposed - View of proposal from Canal Road bridge, looking North towards the city

Figure 6-3 View of existing and proposed site from Canal Road Bridge towards the city

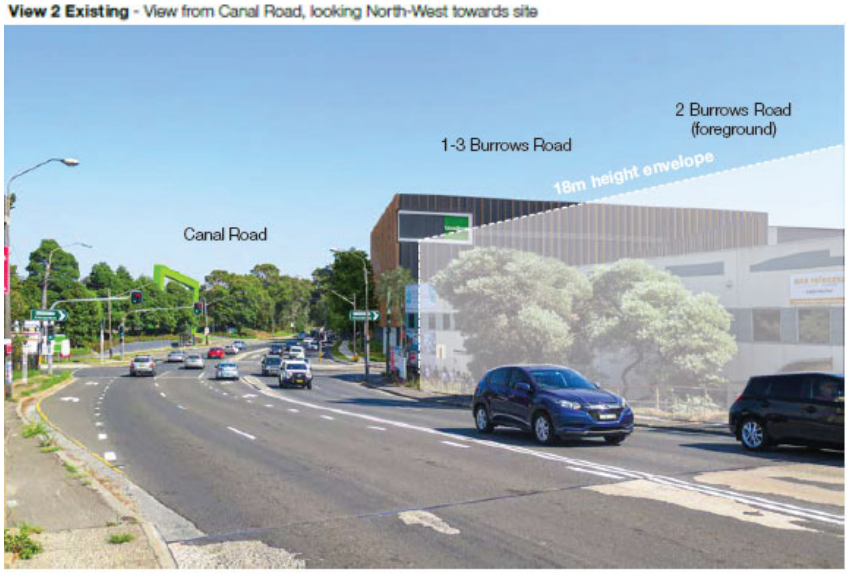
The visual analysis found that:

- The perceived mass of the development is substantially broken down by the foreground elements, such as buildings that front onto the canal and trees
- Existing and proposed trees will create a continuous tree lined along the edge to Burrows Road, masking and breaking down the scale of the proposed building
- The view of the Sydney CBD from the Canal Road bridge will not be obscured.

6.2.2 View 2 – Canal Road approach from the south

Views towards the existing site and proposed site from Canal Road from the south are shown in Figure 6-4.

View 2 Existing - View from Canal Road, looking North-West towards site



View 2 Proposed - View of proposal from Canal Road, looking North-West towards site

Figure 6-4 View of existing and proposed site from Canal Road, looking north-west

The visual analysis found that:

- The massing of the proposed building at the junction of Burrows Road and Canal Road is articulated and distinct from the rest of the building given it's visual prominence at this intersection
- The proposed height of the proposal is substantially higher than the existing buildings opposite on Burrows Road but it is in keeping with the scale of the St Peters Interchange
- The proposal provides a visual barrier to the St Peters Interchange
- The building is not excessively tall in comparison the existing buildings in this view.

6.2.3 View 3 - Corner of Canal Road and Burrows Road

Views towards the existing site and proposed site from the corner of Canal Road and Burrows Road are shown in Figure 6-5.

View 3 Existing - View from the corner of Canal Road and Burrows Road, looking North towards site

View 3 Proposed - View of proposal from the corner of Canal Road and Burrows Road, looking North towards site

Figure 6-5 View of existing and proposed site from the corner of Canal Road and Burrows Road, looking north

The visual analysis found that:

- The proposal will have a distinctive presence at this highly visible corner in comparison to the existing buildings
- The proposed cladding will add a depth and complexity to the building form, and will have a subtle distinction between the ‘top’ and ‘middle’
- The warehouse walls have been designed to present a contemporary form where visible from public roads, reflecting its industrial function
- The setback reducing the perceived height of the building, and also provides adequate area to plant large trees to supplement the existing street trees that will be retained
- The proposed trees will further screen the building, as well as provide extensive new urban tree canopy area.

6.2.4 View 4 - Corner of Canal Road and Burrows Road

Views towards the existing site and proposed site from the corner of Canal Road and Burrows Road are shown in Figure 6-5.

View 4 Existing - View from Canal Road, looking South-East towards site

View 4 Proposed - View of proposal from Canal Road, looking South-East towards site with new Sydney Gateway flyover

Figure 6-6 View of existing and proposed site from Canal Road, looking south-east

The visual analysis found that:

- The viewing mound and planned Sydney Gateway flyover are significant in scale, and as the proposed view demonstrates, the height and bulk of the proposal is not excessive in comparison
- Existing and proposed street trees will provide significant screening along this edge of Canal Road
- The mass and bulk of the proposal is broken down on the Canal Road elevation by the central axis of the building
- The height of the ramp element relates to the adjacent flyover structure, with its curved profile reminiscent of the form of the viewing mound opposite.

6.2.5 View 5 - From Burrows Road looking south-west towards the site

Views towards the existing site and proposed site from Burrows Road looking south-west towards the site are shown in Figure 6-6.

View 5 Existing - View from Burrows Road, looking South-West towards site

View 5 Proposed - View of proposal from Burrows Road, looking South-West towards site with new WestConnex

Figure 6-7 View of existing and proposed site from Burrows Road, looking south-west

The visual analysis found that:

- The mass and bulk of the building is broken up here by way of the office element of the building projecting forward from main warehouse mass
- The height of the building here is in keeping with new WestConnex's interchange context
- The roof level broken down through the use of setbacks and softened through the incorporation of planting to the roof terrace area
- The spiral ramp that sits alongside / behind this cannot be seen from this viewpoint as it is obscured by the WestConnex flyover that sits in front of it
- Proposed tree planting along the edge of the road will reduce the scale of the building.

6.2.6 View 6 – Burrows Road site entrance

Views towards the existing site and proposed site towards the Burrows Road site entrance are shown in Figure 6-8.

View 6 Existing - View of Burrows Road site entrance

View 6 Proposed - Proposed view of Burrows Road main entrance

Figure 6-8 View of existing and proposed site towards the Burrows Road main entrance

The visual analysis found that:

- The office façade design assist in articulating the corner
- The five metre high porte-cochere provides a definitive street address and adds a civic scale to this end of the building
- The upper floor façade and roof overhang has been setback in order to reduce the visual scale of the office
- Visually distinctive and attractive part of the building can be seen from the new WestConnex flyover and gives a ‘landmark’ quality to the building
- The spiral ramp at this end of the building relates to the adjacent interchange.

6.3 Traffic assessment

6.3.1 Assessment overview

This section provides a summary of the Traffic Assessment prepared by Ason Group (Appendix D). A description of the existing traffic and access conditions is provided in Section 2.2.1.

The traffic generated by proposal has been assessed with reference to trip rates provided in the Roads and Maritime Services' *Guide to Traffic Generating Developments* (2013):

- Factory (Industry):
  - Peak Period: 1 vehicle per hour per 100 square metres GFA
- Warehouse:
  - Peak Period: 0.5 vehicle per hour per 100 square metres GFA
- Office:
  - AM Peak: 1.6 vehicles per hour per 100 square metres GFA
  - PM Peak: 1.2 vehicles per hour per 100 square metres GFA.

6.3.2 Existing traffic

As described in section 2.2, the site is currently only 30 percent occupied and as a result, a relatively low level of traffic is currently being generated from the site. During the site inspection, a total of nine light vehicles and no heavy vehicles were observed entering and exiting the site from Gate 01. Gate 02 was closed and, as such, no traffic movement was observed at this location.

In order to provide a more robust comparison between the potential maximum traffic generated from the existing development and the proposed development, Roads and Maritime's traffic generation rates were applied to the existing built form to establish vehicle movements during 100 percent occupancy (see Section 6.3.1). With this application, the maximum traffic generated from the site during AM and PM peak periods for the current built form (FSR 0.6:1) is estimated to be:

- 131 vehicle trips in the AM peak
- 123 vehicle trips in the PM peak.

6.3.3 Predicted traffic

Transport for NSW's traffic generation rates were also applied for the proposal at the approved FSR of 1.5:1. Table 6.1 provides a comparison between the existing development (estimated based on full occupancy at the current FSR of 0.6:1) and the proposal (estimated based on the approved FSR of 1.5:1).

Table 6.1 Existing and predicted traffic from the site

Period	Existing (Built form)	Proposal	Net traffic increase
AM	131	394	+ 263
PM	123	373	+ 250

As shown in Table 6.1, the net traffic generation for the site is estimated to be 263 and 250 vehicles trips in the respective AM and PM peaks. However, the total amount of vehicle trips associated with the proposal has been used for the preliminary traffic model as a conservative assessment.

Light vehicle / heavy vehicle split

In the absence of a detailed operating schedule for the future tenants, it is expected that roughly 15 percent of all movements will be associated with commercial vehicles equating to approximately 59 vehicles per hour during the peak hour. This proportion of trucks is based on the survey data of a similar site in Riverwood Business Park derived from RMS *Trip Generation Surveys Data Report – Business Parks and Industrial Estates.*

The total traffic projections for the site showed a total of 394 arrivals and departures in the AM and 373 arrivals and departures in the AM. Table 6.2 provides a summary of the projected traffic distribution for the site during AM and PM peak periods.

Table 6.2 Traffic generation (Arrival & departure distribution)

	Vehicle type	AM	PM
Inbound	Light vehicle	268	63
	Heavy vehicle	30	28
	Total	297	91
Outbound	Light vehicle	67	254
	Heavy vehicle	30	28
	Total	97	282
	Total	394	373

Future traffic conditions

The opening of WestConnex and Sydney Gateway Road projects would result in a forecast increase in traffic volumes in 2026 and 2036 on Campbell Road and reduction on both Canal Road and Burrows Road. Following the completion of new M5 tunnel and Campbell Road bridge opening, access to the intersection of Burrows Road and Campbell Road will be limited to left turn movements only, which is expected to improve the performance of this intersection.

The Westconnex will be operational prior to lodgement of the DA for the site, at which point detailed modelling will be undertaken to confirm traffic movements.

6.3.4 Access point performance

The operation of the proposed site accesses has been assessed using digital modelling to confirm suitability. The modelling indicates that the proposed site accesses are expected to operate at a good levels of service during both the AM and PM peak periods (refer to Table 6.3), without a requirement for additional infrastructure to facilitate the right-hand turning movements into the site.

Table 6.3 Access point operations

Access point	Peak period	Delay (sec)	Level of service
Burrows Road Access 1 – light vehicle access	AM	8.7	A
	PM	20.4	B
Burrows Road Access 2 – heavy vehicle access	AM	23.5	B
	PM	21.1	B

An assessment of the road network and updated traffic surveys will be undertaken, if required, as part of the DA stage. Subsequently, this will allow a more detailed investigation of potential traffic generation.

6.3.5 Design review

The review of the design undertaken as part of the Traffic Assessment concluded that:

- **Light vehicle access**: As the proposal would include approximately 311 car parking spaces with direct access to/from Burrows Road, a Category 3 access driveway will be required (in accordance with Table 3.1 of *Australian Standard 2890.1;2004 Parking facilities Part 1; Off-street car parking*).
- **Heavy vehicle access**: All heavy vehicles will enter and exit the site via two ramps (separated ramp up/down) (refer to Figure 6-9). The proposed heavy vehicle access has been designed in accordance with *Australian Standard 2890.2:2018 Parking facilities Part 2: Off-street commercial vehicle facilities* (AS2890.2). The design review concluded:
  - The internal design of the service area has been undertaken in accordance with the requirements of AS28090.2 for the maximum length vehicle accessing the site being a B-double of 26 metres in length. All commercial vehicles can enter and exit the site in a forward direction.
  - The swept path analysis undertaken for the proposal demonstrates compliance with relevant sections of AS2890.2.

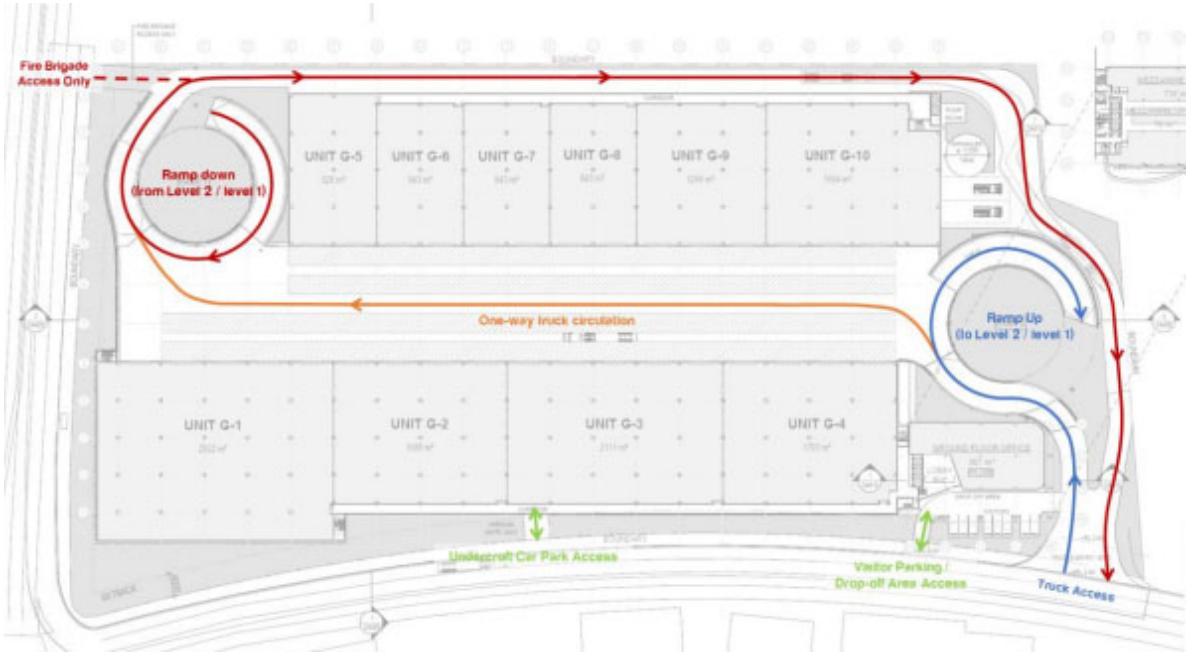


Figure 6-9 Heavy vehicle movement plan (Ason Group, 2020)

The parking demands and traffic generation of the proposal would be confirmed during the DA stage.

6.3.6 Construction traffic

Construction of the facility would readily accommodate all parking, equipment and material to be stored within the site boundary. Additionally, the anticipated level of construction traffic is likely to be lower than the estimated operational traffic and as such the construction traffic would not warrant further assessment at this stage.

A detailed construction traffic management plan (CTMP) will be prepared in accordance with Council's requirements in the subsequent stage of the development process.

6.4 Flood assessment

A Flood Assessment was completed for the site by Costin Roe Consulting (Costin Roe) in November 2019 (Appendix I). The assessment was based on a review of a detailed survey conducted by Costin Roe, the proposal plans and a desktop assessment of the site in relation to the flood modelling and documented flood behaviour included in City of Sydney's *Alexandra Canal Catchment Flood Study Report Final* (Cardno, 2014) and, due to the proximity of the New M5 development to the site, RMS's *WestConnex New M5 EIS Technical Working Paper: Flooding (EIS Appendix P)* (Lyall and Associates, 2015).

The *Alexandra Canal Flood Study* (Cardno 2014), showed water ponding adjacent to the site on Burrows Road. The water ponding is centred around the low point in the road, approximately 100 metres east of the intersection between Canal Road and Burrows Road. The water ponding would occur during the 1 percent Annual Exceedance Probability (AEP) (1 in 100-year ARI storm).

A review of the Alexandra Canal Floodplain Risk Management Plan (City of Sydney 2014) identified areas around the Alexandra Canal that experience mainstream flooding. The site is not mapped within an area that experiences significant flow paths and is not affected by mainstream flooding associated with the Alexandra Canal.

Section 5 of the Interim Floodplain Management Policy (City of Sydney 2014) notes the flood planning level for business/ industrial to be at or above the 1 percent AEP (1 in 100-year ARI) flood level. As noted in review of the Alexandra Canal Flood study, flooding shown on Burrows Road has been estimated to have a 1 percent AEP level of approximately RL 2.3 metres AHD. The finished floor level (FFL) of the proposed office and building is RL 3.5 metres AHD and 5.2 metres AHD respectively, hence is higher than the modelled 1 percent AEP flood level and meets councils minimum flood planning level.

6.5 Arborist assessment

An arborist assessment identified a number of native and exotic tree species at the site (Appendix J). A total of 17 species were identified, 15 native species and two exotic species. Table 6.4 details a summary of the findings in the arborist report. Further assessments will be undertaken at the DA stage to ensure that the proposal will not have a significant impact on local ecology.

Table 6.4 Arborist report summary

Action	Exotic	Native
Trees identified for potential relocation	6 x *Livistona chinensis*	1 x *Elaeocarpus angustifolius* 1 x *Acacia longifolia* 1 x Lemon-scented gum 2 x *Syzygium luehamnnii* 3 x *Eucalyptus robusta* 1 x *Eucalyptus saligna* 1 x *Callistemon viminalis* 5 x *Agonis flexuosa*
Trees identified for removal	1 x *Elaeocarpus angustifolius* 1 x *Acacia longifolia* 1 x Lemon-scented gum 2 x *Syzygium luehamnnii* 3 x *Eucalyptus robusta*	1 x *Celtic sinensis*

Action	Exotic	Native
	1 x *Eucalyptus saligna* 1 x *Callistemon viminalis* 5 x *Agonis flexuosa*	
Trees identified to be retained	Nil	3 x *Angophora costata* 4 x *Melalueca quinquenervia* 1 x *Eucalyptus sideroxylon* 1 x *Angophora bakeri* 5 x *Casuarina cunninghamiana* 8 x *Corymbia maculate* 3 x *Eucalyptus robusta*

6.6 Geotechnical investigation

A geotechnical investigation was undertaken by Pells Sullivan Meynink (PSM, 2019) in March 2019 (Appendix L). The investigation was based on site investigations in 2015 and 2019 and a desktop review to assess the subsurface conditions.

The assessment identified the following geotechnical features within the site:

- The site is underlain by Quaternary alluvium made up of peat, sandy peat and mud as identified on the 1:100,000 Sydney Geological map
- Ground water monitoring undertaken between 24 April and 8 May 2018 indicated the depth to ground water of between 1.5 and 0.66 metres Reduced Level (RL). It was noted that the neighbouring site activity (WestConnex construction site) may have affected the ground water level within the site.

The City of Sydney Acid Sulfate Soil (ASS) Risk Map Sheet has identified the presence of Class 3 ASS on site. Under the classification scheme, Class 3 means that any work greater than one metre below ground surface (bgs) or that would lower the water table by greater than one metre below ground level would require development consent. Further investigation and testing at the DA stage would be required to confirm the presence of ASS.

Based on a review of the report completed by AECOM and PSM, the site is suitable for the proposal if adequate management mechanisms are followed.

6.7 Contamination assessment

A Phase I & Phase II Environmental Site Assessment (ESA) was prepared in support of the proposal by AECOM Pty Ltd (Appendix L). The objectives of the assessment were to identify any areas of potential contamination and assess if the site is likely to present a risk of harm.

A review of the NSW EPA website was undertaken to evaluate if the site or nearby properties were listed under Section 58 on the *Contaminated Land Management Act* (CLMA) *1997*. The site was not listed. Four sites listed under the CLMA were identified in the vicinity of the site, however due to their distance from the site they were considered unlikely to have a significant impact on the site.

The Phase II ESA included the completion of 39 soil boreholes and installation and sampling of eight groundwater monitoring wells. Boreholes identified the presence of fill material (with ash, slag, metal waste, buried concrete slabs etc.) to an average depth of 3.5 metres across the site, which is contaminated with lead, benzo(a)pyrene, asbestos containing material (ACM) and total recoverable hydrocarbons (TRH). Groundwater contains elevated concentrations of metals,

primarily copper, nickel and zinc, which are inferred to be associated with off-site sources. Contamination of fill, natural soil and groundwater by volatile organic compounds (VOC) has not been identified.

The contamination identified in the fill material will require implementation of management controls during site redevelopment. This is expected to comprise a capping strategy, utilising a visual marker layer over the residual fill material, with imported soil material validated as acceptable for commercial/industrial land use and hardstand surfaces (and associated pavement sub-grade) located above the marker layer. The management controls will be documented in a Remedial Action Plan (RAP). A construction-phase site management plan would also need to be prepared and implemented to manage contamination risks during construction.

The assessment concluded that at the completion of redevelopment, the site is expected to be suitable for commercial/industrial land use under SEPP 55 provided it is managed according to a long-term environmental management plan.

6.8 Utility services and infrastructure

A Utilities Review has been prepared by Hurley Palmer Flatt (HPF) that outlines a high-level assessment of the capacity of existing utilities to service the development (Appendix M). The report identifies the location of services, assets and easements and their capacity to accommodate the development. Utilities located on the site include:

- Ausgrid – power supply
- Transgrid – power supply
- Telstra - copper and conduit network
- Optus fibre network
- National Broadband Network (NBN)
- Sydney Water – sewer and water mains
- City of Sydney – stormwater
- Inner West Council – stormwater
- Jemena - gas main.

It was found that the existing site is generally well provisioned with utility services located in the council road network for the proposal. HPF note an updated Ausgrid Services Design Offer is required to reflect the current scheme and a Sydney Water Feasibility Study be submitted for confirmation via the authority. The existing utilities would require no upgrades.

7. Conclusion

Goodman is seeking approval to amend Clause 4.3(2) of the Sydney LEP to amend the permissible height limit to 30 metres to facilitate the redevelopment of a multi-level industrial and warehouse facility up to 29.5 metres at 1-3 Burrows Road, St Peters. Whilst a multi-level industrial facility is currently permissible on the site, the amendment to the existing 18 metres maximum height limit planning control is sought to achieve an increase in the operability and long-term functionality of the land, as well as provide the adequate height clearance for occupants and required heavy vehicle circulation. No increase to GFA is sought under the planning proposal.

This Planning Proposal Justification Report has been prepared by GHD on behalf of Goodman in accordance with Section 3.33 of EP&A Act, the former Department of Planning and Environment's *A guide to preparing planning proposals* and *A guide to preparing local environmental plans* and the requirements of the Planning Proposal Lodgement Checklist issued by Council on 9 December 2019.

The proposed increase to the maximum height limit of the site would realise the strategic potential of the land to be more productive and sustainable within its urban environment. The vision for the proposal is to transform the land into a functional and adaptable multi-storey warehouse building in response to its strategic location in close proximity to important industrial and urban services, close to the Sydney CBD, Sydney Airport, Port Botany, the Cooks River Intermodal Terminal and major transport corridors. This vision aligns with the strategic direction of *A Metropolis of Three Cities – Greater Sydney Region Plan 2019* and is generally consistent with the Eastern City District Plan *Planning Priority E12 – Retaining and managing industrial and urban services land* given it is proposing to maintain the existing industrial use of the site as well as provide a contemporary adaptation of warehousing in the inner city through its innovative design. The proposal would provide land for a wide range of businesses that would support the city's productivity and integrated economy.

The design facilitates access and egress for autonomous vehicles which caters for the future development of the freight industry. Additionally, the design has considered incorporating the latest sustainable technology including: smart metering, solar photovoltaics, energy management, water harvesting and vehicle management. The design will be consistent with the Sydney LEP and Sydney DCP requirements for the site.

The proposal is an appropriate response to the changing land uses immediately adjoining the site and will positively contribute to economic and social benefits for the wider LGA. The assessments accompanying the planning proposal demonstrate that the increased building height is unlikely to significantly impact on key view corridors, traffic movement on Burrows and Canal Road and the amenity of the local environment. The proposal aligns with the State Government's and Council's strategic direction for the retention and management of industrial land. It is recommended that Council support the planning proposal request. Further detailed assessments would be undertaken during the DA stage.

8. References

City of Sydney, 2014. *City of Sydney Employment Lands Strategy 2014-2019,* June 2014.

City of Sydney, 2017. *Environmental Action 2016-2021 Strategy and Action Plan,* March 2017.

City of Sydney, 2008. *Sustainable Sydney 2030,* March 2008.

Department of Planning and Environment, 2018a, *Planning proposals: A guide to preparing planning proposals*, December 2018.

Department of Planning and Environment, 2018b*, Local Environmental Plans: A guide to preparing local environmental plans.*

Government Architect of NSW, 2017a. *Better Placed,* September 2017.

Government Architect of NSW, 2017b. *Draft Greener Places*, October 2017.

Greater Sydney Commission, 2019. *A Metropolis of Three Cities – Greater Sydney Region Plan,* May 2019.

Greater Sydney Commission, 2018. *Eastern City District Plan*, March 2018.

Roads and Maritime Services, 2013 *Guide to Traffic Generating Developments, Updated Traffic Surveys*

Transport for NSW, 2013a, *Sydney's Walking Future: Connecting people and places*, December 2013.

Transport for NSW, 2013b, *Sydney's Cycling Future: Cycling for everyday transport*, December 2013

Transport for NSW, 2013c*, Sydney's Bus Future: Simpler, faster, better bus services*, December 2013

Transport for NSW, 2018a. *Future Transport 2056,* March 2018.

Transport for NSW, 2018b. *Greater Sydney Services and Infrastructure Plan*, March 2018.